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### The Perils of Doubt: Happiness, Epistemological Certainty, and Free Exercise Rights

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# THE PERILS OF DOUBT: HAPPINESS, EPISTEMOLOGICAL CERTAINTY, AND FREE EXERCISE RIGHTS

Eric Apar\*

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## I. INTRODUCTION

Are we better off shielding ourselves from epistemological doubt? If so, should courts and legislatures construe religious free exercise rights so as to enable religious adherents to preserve their salutary dogmatism?<sup>1</sup> A burgeoning literature on the nexus between religious doubt and happiness suggests that religious certainty conduces to psychological well-being.<sup>2</sup> This literature has arisen from a larger effort to comprehend the relationship between religion and happiness more

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<sup>1</sup> See *infra* Part VII (discussing the U.S. Supreme Court’s free exercise jurisprudence).

<sup>2</sup> See *infra* Part III.B (discussing the relationship between religious certainty and happiness).

generally—an effort that has yielded a welter of divergent themes and findings.<sup>3</sup>

The objective of this analysis is two-fold: first, to distill these disparate threads into coherent, meaningful insights; and second, to gesture toward the implications of these insights for free exercise rights. To begin, this Article sketches the psychology of religion and epistemology generally before moving to an examination of the psychological and sociological literature on the religion-happiness nexus in particular. With few dissenting voices, this literature offers compelling evidence that religion promotes various measures of mental well-being.<sup>4</sup>

I will then proceed to the crux of this analysis. The empirical literature reveals that the religion-happiness connection may owe not to religion itself, but rather to the salutary influence of epistemological certainty.<sup>5</sup> This finding clashes with the distaste for dogmatic certainty that prevails among the learned classes, and with the concomitant embrace of creeds that tolerate or even encourage doubt and self-scrutiny.<sup>6</sup> It should bring disquiet to those who exalt the elastic religion of the mainstream and condemn the unyielding faith of the true believer. Finally, this Article questions whether the U.S. Supreme Court's free exercise jurisprudence imperils epistemological certainty and the psychological benefits that accompany it.<sup>7</sup>

The political, legal, and social implications of the religion-happiness connection are far-reaching. From the living room to the courts, from classrooms and houses of worship to legislatures and government

<sup>3</sup> See *infra* Part III (explaining the nexus between religion and psychological well-being).

<sup>4</sup> See *infra* Part III (examining the positive relationship between religion and well-being).

<sup>5</sup> See *infra* Part III.B (discussing the role of certainty in the connection between well-being and religion).

<sup>6</sup> See BRYAN WILSON, RELIGION IN SOCIOLOGICAL PERSPECTIVE 174 (1982) ("Today, religious perceptions share an uneasy and shrinking frontier with rational precepts"); Philip Schwadel, *The Effects of Education on Americans' Religious Practices, Beliefs, and Affiliations*, 53 REV. RELIGIOUS RES. 161, 164 (2011) (examining the capacity of higher education to undermine religious certainty). One scholar states:

The emphasis on alternative viewpoints in higher education works against the exclusivist assumption that one theistic system is superior to other theistic systems. The belief that one religion is exclusively true is contrary to the recognition of disparate perspectives and the diversity of social networks associated with higher levels of education. Put another way, highly educated Americans with diverse social networks are relatively unlikely to emphasize that their friends' and associates' beliefs are patently false.

*Id.*

<sup>7</sup> See *infra* Part VII (discussing the potential impact of the U.S. Supreme Court's free exercise jurisprudence on epistemological certainty).

agencies, we find ourselves compelled either to respect or to breach the walls that individuals, families, and communities build around their faiths. Whether dissonance and doubt manage to penetrate these defenses is a matter not only for parents and teachers, but for courts and legislatures as well. As I will attempt to show, how carefully we guard epistemological certainty—or, alternatively, how enthusiastically we embrace cognitive dissonance as a vessel for truth seeking and personal growth—may substantially influence the happiness of those whose certainty is at stake.

The purpose of this analysis is not to challenge the wisdom of our educational system's commitment to critical reflection or the Supreme Court's free exercise jurisprudence. Doubt has many virtues and certainty many perils. Epistemological flexibility encourages interpersonal understanding and amity.<sup>8</sup> It exposes one to humanity's rich and variegated character, and it can be vital to personal growth.<sup>9</sup> This Article is not advocating that we persist in error to preserve epistemological order. It is merely urging that we consider the costs of psychic dissonance, and that we not allow our zeal for spiritual introspection to obscure the toll that religious doubt can exact.

## II. KEEPING ORDER AND ALLAYING FEAR: THE PSYCHOLOGY OF RELIGION

To place the literature on religion and happiness in its proper context, we first must understand the psychology of religion and belief more generally. The dominant currents in the literature on the psychology of belief share a common theme: human beings try mightily to avoid psychic discord and to construct coherent, orderly systems for interpreting phenomena.<sup>10</sup> Doubt and confusion invade these systems like pathogens, creating dislocation and instability.<sup>11</sup> Put simply, humans seek to keep their epistemological houses in order. Epistemological certainty is a natural—indeed, even an evolutionarily advantageous—condition, a North Star in tempestuous waters.

Yet our universities and graduate schools boast of their capacity to remove students from their comfort zones, to foster critical reflection on even the most cherished orthodoxies.<sup>12</sup> As this Article addresses below,

<sup>8</sup> See *infra* Part V (discussing the relationship between faith and doubt).

<sup>9</sup> See *infra* Part V (examining the benefits of doubt to personal growth).

<sup>10</sup> See *infra* Part II (analyzing theories regarding the relationship between religion and mental well-being).

<sup>11</sup> See *infra* Part III (discussing the negative impact of doubt on well-being).

<sup>12</sup> Rebecca Alpert, *Force Students to Challenge Their Beliefs*, TEMPLE NEWS (Dec. 3, 2013), <http://temple-news.com/opinion/op-ed-force-students-challenge-beliefs/>, archived at <http://perma.cc/5L7A-Q5G6>; see Charlene P.E. Burns, *Cognitive Dissonance Theory and the*

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the Supreme Court's move away from vigorous enforcement of the Free Exercise Clause of the U.S. Constitution has weakened a potent weapon against epistemological doubt—the constitutional right of religious individuals and communities to act consistently with their convictions and to insulate themselves from sources of dissonance, even in the face of an otherwise binding legal obligation.<sup>13</sup>

A. *Attachment, ETAS, and HADD Theories*

Attachment theory and Evolutionary Threat Assessment Systems theory ("ETAS") proceed from the same basic insight—that human beings are fundamentally insecure creatures that think and behave so as to minimize their vulnerability to the vagaries of the external world.<sup>14</sup> According to attachment theory, belief in a deity emerges from the same impulse that induces a child to latch onto its mother.<sup>15</sup> Just as a child seeks the stability of a parent-caretaker, an anchor in an unstable world, so too does the religious devotee seek refuge in the bond she develops with a deity.<sup>16</sup> A complex neurological machinery underpins the formation of this bond.<sup>17</sup> A strong attachment to God, the theory holds, conduces to psychological welfare; a weak connection leaves one exposed to psychological pathology, anxiety, and feelings of insecurity.<sup>18</sup>

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*Induced-Compliance Paradigm: Concerns for Teaching Religious Studies*, 9 TEACHING THEOLOGY & RELIGION 3, 5 (2006) ("[T]he liberal arts educational process itself trades on the power of cognitive dissonance to enhance learning . . .").

<sup>13</sup> See *infra* Part VII (discussing the potential impact of the U.S. Supreme Court's free exercise jurisprudence on epistemological certainty).

<sup>14</sup> See Kevin J. Flannelly & Kathleen Galek, *Religion, Evolution, and Mental Health: Attachment Theory and ETAS Theory*, 49 J. RELIGION & HEALTH 337, 342 (2010) (stating that "the application of Attachment Theory to religion follows logically from the notion that religion provides security in a world of uncertainty" (citation omitted)).

<sup>15</sup> See Lee A. Kirkpatrick & Philip R. Shaver, *An Attachment-Theoretical Approach to Romantic Love and Religious Belief*, 18 PERSONALITY & SOC. PSYCHOL. BULL. 266, 267 (1992) ("Much like an infant's primary caregiver, God may serve as a secure base and as a haven of safety and comfort for believers").

<sup>16</sup> See Christopher G. Ellison, *Religious Involvement and Subjective Well-Being*, 32 J. HEALTH & SOC. BEHAV. 80, 81 (1991) [hereinafter Ellison, *Religious Involvement*] ("[D]ivine interaction may enhance perceived well-being by deepening the sense of orderliness and predictability of events and by investing problematic situations with new religious meanings.").

<sup>17</sup> See Flannelly & Galek, *supra* note 14, at 337–38 ("Evolutionary Threat Assessment Systems Theory (ETAS Theory), proposes that religious and other kinds of beliefs directly affect psychiatric symptomology via specific neural networks in the brain." (citation omitted)).

<sup>18</sup> See Rodney Stark & Jared Maier, *Faith and Happiness*, 50 REV. RELIGIOUS RES. 120, 123 (2008) ("People who feel extremely close to God are nearly twice as likely to be very happy as are those who do not feel near to God."); Flannelly & Galek, *supra* note 14, at 342 (finding that "having a secure attachment with God appears to be associated with psychological well-being"). "[I]ndividuals who had a secure attachment to God were more

Where attachment theorists postulate a human impulse to forge bonds with God, ETAS theorists maintain that religious convictions arise from a basic human drive, hard-wired into our neurochemistry, to neutralize external threats.<sup>19</sup> Here, the evolutionary advantage derives not from a strong attachment to a divine being, but from religion's capacity to defuse threats to human welfare.<sup>20</sup> The distinction here is subtle, for both theories rest on a fundamental desire for stability amid chaos. But where attachment theory does not speak to the substance of the divine anchor that religion provides, ETAS theorists argue that religion's evolutionary advantage requires that the adherent hold a sanguine conception of God.<sup>21</sup> Under ETAS theory, a vindictive God, however stable, does nothing to counterbalance the threats to human well-being that lurk in the external environment—to the contrary, it compounds them.<sup>22</sup> A loving God offers not only stability, as under attachment theory, but safety as well.<sup>23</sup> Buoyed by the belief that a

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satisfied with life and less lonely than individuals who had an insecure attachment to God. . . . [S]ecure attachment [is] related to lower anxiety, and . . . insecure attachment to . . . higher anxiety and negative affect." *Id.* (citations omitted); see also Christopher G. Ellison et al., *Religious Resources, Spiritual Struggles, and Mental Health in a Nationwide Sample of PCUSA Clergy*, 59 PASTORAL PSYCHOL. 287, 289–90 (2010) [hereinafter Ellison, *Religious Resources*] ("Struggles in one's relationship with the divine are associated with a range of mental health outcomes, such as elevated rates of anxiety . . . depression and suicidality." (citations omitted)).

<sup>19</sup> See Flannelly & Galek, *supra* note 14, at 345 ("[C]ertain beliefs about God and life-after-death reduce ETAS assessments about the dangerousness of the world and . . . this directly reduces psychiatric symptoms.").

<sup>20</sup> See David H. Rosmarin, Kenneth I. Pargament & Annette Mahoney, *The Role of Religiousness in Anxiety, Depression, and Happiness in a Jewish Community Sample: A Preliminary Investigation*, 12 MENTAL HEALTH, RELIGION & CULTURE 97, 108 (2009) ("[T]rust and mistrust in God were significant predictors of anxiety, depression, and happiness. Trust in God . . . may engender positive cognitions about the future, leading to decreases in hopelessness and depression and increases in happiness.").

<sup>21</sup> See *id.* at 100 (considering the ways in which trust in God reduces anxiety). Some scholars maintain that:

[T]rust in God may reduce negative appraisals of perceived danger. After all, if one believes that God knows everything, has the power to take care of any situation, and is merciful, generous, and righteous, there would seem to be less to be afraid of. Furthermore, while intolerance to uncontrollability and unpredictability has been posited to play a central role in human anxiety, the importance of these cognitive factors may be undermined by the belief that God is merciful and generous . . . .

*Id.* (citation omitted).

<sup>22</sup> See Flannelly & Galek, *supra* note 14, at 345 ("[P]leasant beliefs about life-after-death were all associated with lower levels of psychiatric symptoms, while unpleasant afterlife beliefs were associated with higher levels of symptoms among normal adults.").

<sup>23</sup> See *id.* at 344–45 (describing the relationship between religious security and psychiatric disorders).

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beneficent overseer superintends their surroundings, human beings can venture into a hazardous world in relative peace.<sup>24</sup>

According to the Hyperactive Agency Detection Device (“HADD”) hypothesis, belief in God derives from our innate desire to ascribe phenomena to an intelligent agent whose actions are comprehensible.<sup>25</sup> The human psyche rebels against arbitrariness and instability.<sup>26</sup> Its natural condition is to discern a knowing actor responsible for the stewardship of an orderly universe.<sup>27</sup> Together, these theories testify to a common principle: man is essentially a scared and fragile creature, grasping for order in a tumultuous world. Religion—at least when it confers on its practitioners a feeling of comfort and safety—helps allay this condition.<sup>28</sup> It is both natural and evolutionarily advantageous.<sup>29</sup> It empowers man to function in a dangerous world and to cope with the vicissitudes and uncertainties of existence.<sup>30</sup> But it serves this function only insofar as it offers a genuine refuge from those vicissitudes. If religion is yet another uncertainty in a precarious world, man remains rudderless.<sup>31</sup>

<sup>24</sup> See *id.* at 342–45 (finding that a secure attachment engenders feelings of safety in threatening circumstances).

<sup>25</sup> See Joshua C. Thurow, *Does Cognitive Science Show Belief in God to be Irrational? The Epistemic Consequences of the Cognitive Science of Religion*, 74 INT. J. PHILOS. & RELIGION 77, 80–81 (2013) (“Humans possess . . . a hypersensitive agency detection device—HADD. In virtue of HADD, people seem to have a strong bias to interpret ambiguous evidence as caused by . . . an agent.” (citations omitted)).

<sup>26</sup> See *id.* at 81 (discussing the tendency to seek explanations for events and suggesting “that god concepts are minimally counterintuitive”).

<sup>27</sup> See JUSTIN L. BARRETT, *WHY WOULD ANYONE BELIEVE IN GOD?* 31 (2004) (maintaining that belief in God is a natural phenomenon arising from cognitive tools possessed by every human being).

<sup>28</sup> See Ellison, *Religious Involvement*, *supra* note 16, at 82 (“There is mounting evidence that persons who enjoy a greater sense of coherence and order in their lives also have better physical and psychological health than others. [R]esearchers frequently have suggested that strong religious beliefs and experiences may deepen this sense of meaning and comprehensibility.” (citations omitted)).

<sup>29</sup> Ed Diener et al., *The Religion Paradox: If Religion Makes People Happy, Why Are So Many Dropping Out?*, 101 J. PERSONALITY & SOC. PSYCHOL. 1278, 1279 (2011) (“[E]volutionary analysts [argue that] religion is nearly universal because it serves adaptive purposes. The supporters of religion argue that by fostering morality, social cohesion, and group survival, religion may aid coping.”).

<sup>30</sup> See Jan Eichhorn, *Happiness for Believers? Contextualizing the Effects of Religiosity on Life-Satisfaction*, 28 EUR. SOC. REV. 583, 584–85 (2012) (analyzing the influence of religiosity on life satisfaction in different countries).

<sup>31</sup> See Christopher G. Ellison et al., *Religious Doubts and Sleep Quality: Findings from a Nationwide Study of Presbyterians*, 53 REV. RELIGIOUS RES. 119, 123 (2011) [hereinafter Ellison et al., *Religious Doubt*] (“[B]ecause religious faith provides a sense of meaning and purpose . . . unresolved religious doubts may signal an existential crisis. Individuals dealing with this uncertainty . . . may feel restless and worried, and may find it more

*B. Terror Management Theory*

Under terror management theory, systems of meaning and belief develop in response to humans' innate terror of death and from the transience of human life.<sup>32</sup> Coherent systems of meaning and belief offer stability and permanence in the face of human mortality.<sup>33</sup> Religion serves three purposes here. First, religion responds directly to our dread of death by doing away with mortality altogether.<sup>34</sup> Belief in an afterlife allays our fear of death by converting the specter of expiration into a mere transitional moment—though, as with ETAS theory, the benefit here depends on the belief that one is transitioning to a happier place, a wrinkle to which this Article will return later.<sup>35</sup> Second, religion imbues its adherents with purpose and direction—it militates against the depressing conclusion that life is not only tragically fleeting, but

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difficult to deal with the demands of daily life and personal problems.”). “The negative thoughts and ruminations over this form of spiritual strain . . . may give rise to feelings of psychological distress . . . [and] may in turn trigger the release of stress hormones [] that promote mental and physiological arousal.” *Id.* (citations omitted).

<sup>32</sup> See R. David Hayward & Marta Elliott, *Fitting in with the Flock: Social Attractiveness as a Mechanism for Well-Being in Religious Groups*, 39 EUR. J. SOC. PSYCHOL. 592, 593 (2009) (examining the importance of specific aspects of religious beliefs). These scholars explain:

There is theoretical support from the Terror Management perspective that rather than the specific contents of religious beliefs, it is the capacity for religious faith to provide a sense of existential certainty that is most important in promoting well-being. While this aspect of religion has been directly measured less frequently than others, it has some empirical support.

*Id.* (citations omitted).

<sup>33</sup> See Gareth J. Morris & Tina McAdie, *Are Personality, Well-Being and Death Anxiety Related to Religious Affiliation?*, 12 MENTAL HEALTH, RELIGION & CULTURE 115, 116 (2009) (“[S]tudies have found strong religious conviction to be associated with lower death anxiety.” (citations omitted)).

<sup>34</sup> See Samuel R. Weber et al., *Psychological Distress Among Religious Nonbelievers: A Systematic Review*, 51 J. REL. HEALTH 72, 80 (2012) (“In a Swedish study, atheists and agnostics scored higher on the Death Depression Scale . . . than did believers, indicating greater death anxiety in the non-believing groups.”).

<sup>35</sup> *Id.*; see also Morris & McAdie, *supra* note 33, at 119 (discussing Greenberg’s Terror Management Theory). Greenberg found as follows:

Terror Management Theory as Christians scored lower for death anxiety than the non-religious participants. However, as Muslims scored significantly higher than the non-religious, this refutes TMT. It appears as though for Muslims, belief in the afterlife does not serve to reduce anxiety about death. It can be understood through the individual responses of the Christians in the questionnaire how TMT functions. Themes of heaven and eternal life are prevalent, whereas for Muslims the afterlife may be something to fear . . .

*Id.*



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meaningless as well.<sup>36</sup> Third, religion breeds attachment to values and principles that transcend the ephemeral material world.<sup>37</sup> The stability and permanence of these values counterbalance the essential instability and impermanence of human existence. While flesh and blood may perish, our ideals persist. Belief helps us fashion an enduring legacy in the face of our mortality.<sup>38</sup>

These last two functions are not exclusive to religion. Strong conviction, whether religious or secular, can confer meaning, purpose, and a feeling of permanence. Our terror of death motivates us to repel

<sup>36</sup> See Christopher G. Ellison et al., *Does Religious Commitment Contribute to Individual Life Satisfaction?*, 68 SOC. FORCES 100, 102 (1989) [hereinafter Ellison et al., *Does Religious Commitment Contribute*] ("After holding constant the influence of background variables . . . only religious salience was a useful predictor of a sense of the 'meaning' and 'purpose' of life.").

<sup>37</sup> Abram Rosenblatt et al., *Evidence for Terror Management Theory: I. The Effects of Mortality Salience on Reactions to Those Who Violate or Uphold Cultural Values*, 57 J. PERSONALITY & SOC. PSYCHOL. 681, 681 (1989). See Jeff Greenberg et al., *Evidence for Terror Management Theory II: The Effects of Mortality Salience on Reactions to Those Who Threaten or Bolster the Cultural Worldview*, 58 J. PERSONALITY & SOC. PSYCHOL. 308, 308 (1990) [hereinafter *Theory II*] ("Although there is great variability in the contents of the worldviews associated with any given culture, all such conceptions provide the universe with order, meaning, value, and the possibility of either literal or symbolic immortality.").

<sup>38</sup> See Rosenblatt et al., *supra* note 37, at 689 (demonstrating the important role morals play in shaping cultural standards). Rosenblatt explains:

[M]oral principles are part of the more general set of cultural standards against which people compare themselves to assess their value. Thus, moral principles facilitate the individual's efforts to conceive of him- or herself as a valued contributor to something meaningful and permanent (the culture). . . . [T]he cultural anxiety-buffer allows continual repression of our existential terror. . . . Although the terror may on occasion rise to consciousness in muted form, most of the anxiety people experience results from threats to either the worldview or self-esteem components of the cultural anxiety-buffer that protects them from underlying existential terror.

*Id.* (citation omitted). *Theory II* states:

[F]rom a terror management perspective, one very important function of culture . . . is to provide a means of conceptualizing reality that allows for the possibility of equanimity in the face of human vulnerability and mortality. Put simply, people's beliefs about reality provide a buffer against the anxiety that results from living in a largely uncontrollable, perilous universe, where the only certainty is death.

*Theory II*, *supra* note 37, at 308. "Christians with a strong religious conviction scored lower for death anxiety than non-religious participants. . . . [B]elief in the afterlife is associated with lower death anxiety." Morris & McAdie, *supra* note 33, at 118. "Witter and associates suggest that religiosity may facilitate . . . 'achieving enduring significance beyond one's physical self and life.'" Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 103 (citations omitted); see also Robert A. Witter et al., *Religion and Subjective Well-Being in Adulthood: A Quantitative Synthesis*, 26 REV. RELIGIOUS RES. 332, 332 (1985) (noting the link between "achieving enduring significance beyond one's physical self and life" and "inner contentment.").

threats not only to our religious conceptions, but also to our cultural and political values.<sup>39</sup> Researchers have found that heightened mortality awareness diminishes tolerance of heterodoxy and magnifies the desire to reinforce norms.<sup>40</sup> After responding to a questionnaire designed to raise mortality awareness, judges doled out harsher penalties for hypothetical defendants whose behavior challenged social norms.<sup>41</sup> Moreover, study participants reported stronger animus toward members of other religious denominations after experimenters made mortality salient.<sup>42</sup> They also recorded amplified hostility toward those who questioned—and a greater affinity for those who praised—their cultural worldviews.<sup>43</sup>

Our terror of death and our beliefs, religious or otherwise, appear to be interwoven. To the extent that religion kindles an unusually powerful sense of meaning and permanence—and inasmuch as it simply eliminates mortality entirely—it is uniquely adroit at managing our fear of death.<sup>44</sup> But the purpose of this discussion is not to distinguish

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<sup>39</sup> See Rosenblatt et al., *supra* note 37, at 688 (examining reactions to deviations from an individual's cultural worldview). Terror management theory is described as follows:

According to terror management theory, the beliefs and values that make up an individual's cultural worldview serve the vital function of buffering the anxiety that results from awareness of human vulnerability and mortality. The theory posits that the cultural worldview espoused by any given individual is a fragile construction that needs persistent social validation . . . Those who deviate from cultural standards are responded to with disdain because such behavior threatens the values that underlie the individual's source of security. Similarly, those who uphold cultural values are admired because such behavior validates the individual's values.

*Id.*; see also *Theory II*, *supra* note 37, at 309 ("Cultural worldviews are structured so that protection from negative outcomes and a sense of immortality depend on fulfilling the cultural requirements for being valued.").

<sup>40</sup> See Rosenblatt et al., *supra* note 37, at 688 ("[T]he six studies reported in this article provide consistent support for terror management theory . . . . The present finding that reminding subjects of their mortality intensifies such reactions supports the proposition that the cultural worldview serves to protect individuals from anxiety concerning death."); see also *Theory II*, *supra* note 37, at 309 ("[P]ositive reactions to similar others and negative reactions to dissimilar others occur partly because of the impact such individuals have on faith in one's worldview.").

<sup>41</sup> See Rosenblatt et al., *supra* note 37, at 688 ("[S]ubjects who were reminded of their mortality consistently recommended harsher treatment of a moral transgressor.").

<sup>42</sup> See *Theory II*, *supra* note 37, at 318 ("Mortality salience appears to increase in-group favoritism, rejection of those who are different, and authoritarian tendencies.").

<sup>43</sup> See *id.* ("This suggests that whenever events heighten mortality salience (e.g., newspaper accounts of catastrophes or violence in intergroup and interindividual conflicts), in-group solidarity, out-group derogation, nationalism, religious extremism, prejudice, discrimination, and intolerance of deviance are likely to escalate.").

<sup>44</sup> See Neal Krause & Keith M. Wulff, *Religious Doubt and Health: Exploring the Potential Dark Side of Religion*, 65 *SOCIOLOGY OF RELIGION* 35, 39-40 (2004) ("[A] number of

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religious from secular conviction. Rather, it is to illustrate the stakes involved in matters of belief, religion, or otherwise. Terror management theory suggests that when the ideologue lashes out at her detractors, there is more than simple divergence of opinion at work. Indeed, such outrage emerges as well from an effort to allay death anxiety.

C. *Cognitive Dissonance*

Cognitive dissonance theorists posit that the human mind seeks psychic harmony. Human beings, the theory holds, will go to great lengths to convince themselves that their epistemologies are true, consistent, and consonant with their behavior.<sup>45</sup> Perceived incongruence among beliefs or between beliefs and behavior engenders painful discomfort that the mind seeks to quell.<sup>46</sup> One might attempt to reason one's way out of the tension, manipulating logic to bring discordant beliefs or behaviors into concordance.<sup>47</sup> One might claim a lack of volition. Indeed, evidence suggests that we feel more comfortable embracing dissonance-inducing behaviors or beliefs when doing so is necessary to receive a particularly enticing reward or to avoid an

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investigators maintain that one of the primary functions of religion is to provide a sense of meaning in life." (citation omitted)). "[I]dentity theory suggests that religious doubt may be pernicious primarily because it deprives a person of one of the most fundamental benefits of religion—a sense of meaning in life." *Id.* "[P]roblems associated with roles that are valued highly have a more noxious effect on health and well-being than difficulties that arise in roles that are not as important." *Id.* at 40 (citation omitted). "[I]t follows that if religion is valued highly, and doubts about religion arise, then subsequent feelings of cognitive dissonance should be especially troublesome." *Id.*

<sup>45</sup> See generally LEON FESTINGER, A THEORY OF COGNITIVE DISSONANCE 3–4, 10–11 (1957) (discussing the theory of cognitive dissonance and its effects on human psychology).

<sup>46</sup> See Burns, *supra* note 12, at 4 (explaining situations that lead to the "Hypocrisy Effect"). Burns elaborates:

When situations reveal an inconsistency between ideas to which one has personal commitment and [one's] actual behavior, dissonance tends to be very high and the need to reduce it is strong. When the beliefs are personally important, being placed in a position that makes it clear that one is not *practicing what she preaches* can be perceived as a threat to one's self-image.

*Id.* "Cognitive dissonance indeed appears to cause an arousing and negative affective state. . . . Moreover, the negative affect evoked by dissonance motivates dissonance reduction . . . ." Christopher T. Burris, Eddie Harmon-Jones & W. Ryan Tarpley, "By Faith Alone": Religious Agitation and Cognitive Dissonance, 19 BASIC & APPLIED SOC. PSYCHOL. 17, 18 (1997) (citations omitted).

<sup>47</sup> See generally FESTINGER, *supra* note 45, at 31 (explaining how people rationalize behavior discordant with their beliefs); Burns, *supra* note 12, at 3–4 (elaborating on the discounting of dissonant ideas and the emphasizing of consonant ideas).

especially undesirable outcome.<sup>48</sup> One might attack the credibility or motives of the source rather than engage the conflict substantively.<sup>49</sup> One might cling even more tightly to the challenged conviction, drowning out the tension.<sup>50</sup> Finally, one might alter one's behavior or beliefs in an effort to erase the contradiction and restore psychic harmony.<sup>51</sup> However one escapes the discomfort, the implication is clear—our minds seek peace and eschew angst.

Epistemological doubt is a species of cognitive dissonance.<sup>52</sup> Religious doubt in particular can be a singularly discomfiting experience, for religion often undergirds its adherents' entire epistemology—remove the foundation, and the whole edifice collapses.<sup>53</sup>

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<sup>48</sup> See Burns, *supra* note 12, at 4 (“[W]hen a learner believes there is no choice, dissonance is nominal because the lack of choice is itself sufficient justification for compliance.” (citation omitted)). “Despite their inability to practice plural marriage, [Mormons] could point to external coercion as justification for their behavior and thus minimize any dissonance they felt. However, . . . [b]ecause the final push to conform came from within the Mormon community rather than from without, Mormons could no longer point to outside forces for this change in belief.” Elizabeth Harmer-Dionne, *Once a Peculiar People: Cognitive Dissonance and the Suppression of Mormon Polygamy as a Case Study Negating the Belief-Action Distinction*, 50 STAN. L. REV. 1295, 1318 (1997–98) (footnote omitted).

<sup>49</sup> See Burns, *supra* note 12, at 4, 6 (discussing the “Hypocrisy Effect”).

<sup>50</sup> See *id.* at 4 (“In some instances, then, cognitive dissonance can actually intensify original attitudes.” (citation omitted)); see also Burris et al., *supra* note 46, at 24 (“More extreme profession of transcendent beliefs (God’s working as mysterious but benevolent, etc.) following exposure to a belief-threatening article was associated with reduced dissonance-related affect (both agitation and discomfort).”); Harmer-Dionne, *supra* note 48, at 1309 (“Contrary to ordinary expectations, external challenge and resistance may actually strengthen an adherent’s commitment to a particular religious creed.”).

<sup>51</sup> See Burns, *supra* note 12, at 4 (“Any dissonance that does arise can be reduced or eliminated by changing ones beliefs to make them more consonant with the induced behavior.”) (citation omitted).

<sup>52</sup> See Neal Krause, *Religious Doubt and Psychological Well-Being: A Longitudinal Investigation*, 50 REV. OF RELIGIOUS RESEARCH, 94, 95–96 (2006) [hereinafter Krause, *Religious Doubt and Psychological Well-Being*] (“[R]eligious doubt may be viewed as an unsettling state of indecision that arises from seeing the validity of two seemingly inconsistent points of view. . . . Viewed in this way, doubt may be seen as a specific instance of the more general problem of cognitive dissonance.” (citation omitted)); see also Krause & Wulff, *supra* note 44, at 36 (“Religious doubt is defined as, ‘. . . a feeling of uncertainty toward, and a questioning of, religious teachings and beliefs.’” (citation omitted)).

<sup>53</sup> See Theta Gribbins & Brian Vandenberg, *Religious Fundamentalism, the Need for Cognitive Closure, and Helping*, 21 INT’L J. FOR THE PSYCHOL. OF RELIGION 106, 106–07 (2011) (analyzing religion’s role as a central system of beliefs). Gribbins and Vandenberg explain:

[Religious fundamentalism] differs from other fundamentalisms with rigidly held ideologies, such as market fundamentalism for example, in that it is an overarching belief system that regulates not only religious thoughts but all conceptions; it is in essence a ‘meta-belief’ or worldview. This worldview provides an absolute foundation for determining what is and what should be, what is good and evil, and

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To grow up in the embrace of a loving, omnipotent God, only to discover the ultimate rejoinder in the form of human suffering; to believe that one possesses the one Truth only to find that it is merely one among many—such realizations not only discomfort the believer, they undermine the entire moral structure that derives from these convictions.<sup>54</sup> The triggers of epistemological and religious doubt are ubiquitous.<sup>55</sup> In a heterogeneous society, we constantly encounter reminders that our convictions are not universal, that others hold divergent views with equal ardor and confidence.<sup>56</sup> When these societal cues alert us to the

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what is known and unknowable, which are conferred by an omniscient, omnipotent being.

*Id.* (citations omitted).

<sup>54</sup> See *id.* (explaining the psychological effects or realization of such); see also Krause & Wulff, *supra* note 44, at 38 ([I]t may be difficult for a person to believe in a loving and protecting God, while at the same time recognizing there is a good deal of suffering, pain, and injustice in the world. Cognitive dissonance is especially important . . . because, as Festinger . . . argues, holding views that are incompatible can be a significant source of psychological distress." (citation omitted)). See generally Ellison et al., *Religious Doubts*, *supra* note 31, at 122 (considering the sources and consequences of religious reservations). These scholars believe that:

Doubts or other nagging reservations about matters of faith can emerge from numerous sources, including the problem of evil, as believers struggle to understand why bad things happen, particularly to good people. Many persons also grapple with challenges posed by scientific developments, as well as a host of other issues concerning religious dogmas and institutional practices. . . . [A] growing body of evidence links unresolved doubts with a range of negative mental and physical health outcomes.

*Id.* (citations omitted).

<sup>55</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 97 ("Doubts about religion are inevitable because the world is filled with seemingly contradictory evidence and experiences . . . [s]o the real issue is not the elimination of doubt. Instead, it involves how doubt is handled—how people respond to it." (citation omitted)); see also Krause & Wulff, *supra* note 44, at 50 ("[B]elief systems are maintained primarily through commitment, and commitment is, in turn, dependent on validation. . . . It is simply not possible to verify that God exists, and the character, purposes, and will of God cannot be validated. When validation is not possible, doubts may arise."); Greenberg et al., *supra* note 37, at 309 ("Because the cultural anxiety-buffer is by its very nature a fragile social construction . . . it requires continual bolstering." (citations omitted)). "[P]eople are constantly reminded of their vulnerability and mortality; one need only pick up a newspaper or turn on a television news program to find examples of such reminders of the fragile nature of human existence." *Id.*

<sup>56</sup> See Simon Dein, *Religious Doubts: Implications for Psychopathology and Psychotherapy*, 77 BULLETIN OF THE MENNINGER CLINIC 201, 204 (2013) ("[F]ar more than in the past, believers must live their faith in a condition of doubt and uncertainty. Today, religious faith . . . exists as but one possibility alongside a range of nonreligious worldviews. Pluralistic worldviews intensify the experience of doubt."). *Theory II* states:

[T]he diverse array of beliefs and values that are encountered provide a reminder that one's worldview may not be valid in any absolute

possibility that our beliefs are misguided, we experience profound disquiet—but the damage does not end there. Such cues also undermine a primordial attachment to God (attachment theory), a threat-neutralizing mechanism (ETAS theory), our desire to discern order in the universe (HADD theory), and our capacity to allay our terror of death (terror management theory). Understanding these links between religion and psychology is vital to situating the empirical literature on religion and happiness in its proper context.

### III. THE HAPPY FAITHFUL: THE RELIGION-HAPPINESS NEXUS

Recent decades have seen an explosion of research into the connection between religion and happiness.<sup>57</sup> Once an obscure niche, the field has grown into a fruitful area of research at the forefront of psychology, sociology, and medicine.<sup>58</sup> While the results have not been uniform, the weight of the evidence suggests that religiosity correlates with various indices of mental and physical well-being.<sup>59</sup>

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sense, highlighting the tenuous nature of the cultural anxiety-buffer and contributing to the need for ongoing bolstering and protection from threat. To the extent that people need to believe that one and only one conception of reality is ultimately correct, the existence of conceptions at variance with their own implies that someone must be mistaken.

*Theory II*, *supra* note 37, at 309.

<sup>57</sup> See generally HAROLD C. KOENIG ET AL., HANDBOOK OF RELIGION AND HEALTH 101-17 (2001) (presenting data on numerous studies correlating religion with well-being).

<sup>58</sup> See *id.* at 97-98, 116-17 (identifying a growth in research into the connection between religion and happiness).

<sup>59</sup> See Diener et al., *supra* note 29, at 1278 (“In the National Opinion Research Center’s General Social Surveys of Americans between 1972 and 2008, the percentage of people reporting that they were ‘very happy’ ranged from 26% among those never attending religious services to 48% among those attending services more than weekly.”). Ellison suggests that:

[R]eligion may enhance various aspects of well-being in at least *four* ways: 1) through social integration and support; 2) through the establishment of personal relationships with a divine other; 3) through the provision of systems of meaning and existential coherence; and 4) through the promotion of more specific patterns of religious organization and personal lifestyle.

Ellison, *Religious Involvement*, *supra* note 16, at 80. Another scholar believes that:

In large part, results from these studies have been consistent in indicating a salutary relationship between religious involvement and health status . . . Across this literature, the consistency of findings despite the diversity of samples, designs, methodologies, religious measures, health outcomes, and population characteristics actually serves to strengthen the inference of a positive association between religion and health.

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A preliminary note is in order. Happiness is a nebulous and capacious concept, encompassing various facets of well-being from short-term gratification to long-term fulfillment. However, because religion appears to exert a salutary effect across these diverse measures of personal welfare, this Article will steer clear of the definitional morass and employ the catch-all term “happiness” to refer to generally pleasant states of being, from the ephemeral to the more enduring.

It is worth observing that the social sciences—psychology in particular—have not always held such a sunny conception of religion.<sup>60</sup> Indeed, recent trends have marked a departure from the old Freudian view of religion as neurosis and pathology.<sup>61</sup> On this traditional account, religion meant repression of primal impulses, guilt and shame at violating rigid precepts, and dread of a fiery hereafter.<sup>62</sup> This attitude has by no means vanished. It survives most prominently in the polemics of the “New Atheists,” who have tapped a fertile market for anti-religious sentiment.<sup>63</sup> It also finds some empirical support in a distinct minority of studies that have found that religion correlates with death, anxiety, guilt, and neuroticism.<sup>64</sup>

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Loren Marks, *Religion and Bio-Psycho-Social Health: A Review and Conceptual Model*, 44 J. REL. & HEALTH 173, 179 (2005) (quoting KOENIG ET AL.). “[D]ata from a national sample [show] that those who are most involved with their religion are almost twice as likely to report being ‘very happy’ than those with the least involvement . . . [R]eligious variables accounted for 5–7% of variance in life satisfaction.” Daniel Mochon, Michael I. Norton & Dan Ariely, *Who Benefits from Religion?*, 101 SOC. INDICATORS RES. 1, 2 (2011) (citations omitted). “[R]eligious adults report greater feelings of social integration, a personal relationship with a divine being, a good sense of cohesion in life, and a specified pattern of organization in which to live one’s life. These outcomes are associated with greater levels of personal well-being for adults.” Richard J. Petts & Chris Knoester, *Parents’ Religious Heterogamy and Children’s Well-Being*, 46 J. SCI. STUD. OF RELIGION 373, 374 (2007).

<sup>60</sup> See Marks, *supra* note 59, at 174 (“For the first three-quarters of the 20th century, the prevalent view of religion’s relationship to health among both medical and social scientists was apathetic at best, and actively hostile at worst.”).

<sup>61</sup> See *id.* (“By the mid-1990s, the pendulum of religion-related medical and social science publication seemed to have swung . . . to [] empirical work that frequently correlated religious experience with a variety of beneficial health-related outcomes. . .”).

<sup>62</sup> See *id.* (“This hostile camp is perhaps most conspicuously represented by Freud, who maligned religion as mankind’s universal obsessional neurosis.” (citation omitted)).

<sup>63</sup> See Diener et al., *supra* note 29, at 1279 (“Although religion is a widespread social and cultural phenomenon, its atheist critics claim that it is dysfunctional. It is ‘dangerous nonsense’ that does ‘not make its adherents happy’ . . . This religion-breeds-misery meme resonates with the surmise of Sigmund Freud, who famously viewed religion as ‘a universal obsessional neurosis.’” (citations omitted)).

<sup>64</sup> See generally John Maltby, *Protecting the Sacred and Expressions of Rituality: Examining the Relationship Between Extrinsic Dimensions of Religiosity and Unhealthy Guilt*, 78 PSYCHOL. AND PSYCHOTHERAPY: THEORY, RES. & PRACTICE 77, 81 (2005) (explaining the connection between religion and negative psychological states).

Still, the thrust of the empirical literature is clear—religion appears to exert a salutary effect on happiness.<sup>65</sup> This relationship appears across various dimensions of happiness—from transient well-being to abiding satisfaction, from the absence of depression and psychological pathology to affirmative contentment.<sup>66</sup>

On a deeper level, however, complexities intrude that prevent a straightforward embrace of religion as a vehicle for happiness. Religion is a complex and multifaceted construct, and researchers early recognized that more sophisticated measures of religiosity than “attendance at religious services” or “frequency of prayer” were necessary to comprehend the nexus between religion and happiness.<sup>67</sup> The most noted distinction that emerged was that between intrinsic and extrinsic religiosity.<sup>68</sup>

#### A. *The Intrinsic-Extrinsic Divide*

Many have asserted that the religion-happiness nexus owes to the social connections that religious involvement nurtures.<sup>69</sup> Congregational

<sup>65</sup> See generally KOENIG ET AL., *supra* note 57, at 101 (describing the correlation between religion and positive psychological states).

<sup>66</sup> Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 114–16, 106 (defining life satisfaction as “essentially a cognitive assessment of progress toward desired goals—an evaluation of the congruence between ideal and real life circumstances” and noting its connection to religion). Marks expands on this notion as follows:

In addition to general ‘salutary religious effect,’ certain religious practices have also been correlated with positive coping in connection with both ‘acute’ and ‘day-to-day stresses’ of life in a wide variety of contexts . . . Religiosity has also been correlated with a number of specific positive mental health outcomes, including greater personal happiness and/or self-esteem . . . and lower rates of depression.

Marks, *supra* note 59, at 180 (citations omitted). See generally KOENIG ET AL., *supra* note 57, at 117 (summarizing the relationship between religion and happiness).

<sup>67</sup> See David H. Rosmarin, Kenneth I. Pargament & Annette Mahoney, *The Role of Religiousness in Anxiety, Depression, and Happiness in a Jewish Community Sample: A Preliminary Investigation*, 12 MENTAL HEALTH, REL., & CULTURE 97, 99–100 (2009) (“[A]n emerging trend in psychology of religion research has been to study aspects of religiousness that are more proximally and functionally connected to psychological variables alongside measures of global religiousness. Examples of proximal religiousness include perceived closeness to God, religious coping, sanctification, and religious/spiritual struggles.” (citations omitted)).

<sup>68</sup> See Ahmed M. Abdel-Khalek, *Happiness, Health, and Religiosity: Significant Relations*, 9 MENTAL HEALTH, REL. & CULTURE 85, 87–88 (2006) (“There are several recent theoretical and empirical studies emphasizing the different experiences and outcomes associated with diverse types of religiosity. Foremost among them is the intrinsic versus extrinsic religious orientation.”).

<sup>69</sup> See Eichhorn, *supra* note 30, at 584–85 (“Religiosity might provide a safety net function, offering security and comfort particularly in difficult or uncertain life situations. The engagement in communal activities and the provision of a network of acquaintances



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life can serve as a well-spring for personal relationships and a network of support in times of distress.<sup>70</sup> Indeed, empirical research has amply demonstrated the connection between social ties and happiness.<sup>71</sup> The religion-happiness connection, many have argued, is chiefly an extension of this well-corroborated insight.

That congregational life forges intimate social connections is indeed an important part of the religion-happiness calculus. Congregants derive pleasure, meaning, and comfort from the bonds that they develop with their coreligionists.<sup>72</sup> Is such the essence of faith? Does particularistic dogma belong on the periphery, with community and brotherhood at the fore?

It is likely that this common explanation of the religion-happiness nexus misconceives the function of social connections. How precisely it misunderstands this function is a subject to which this Article will return later.<sup>73</sup> For now, it suffices to note that this explanation clashes with a well-established divide in the empirical literature. Where intrinsic religiosity—religion for its own sake, true belief—correlates positively with happiness in its various manifestations, extrinsic religiosity—religion for the purpose of achieving some ancillary objective, such as cultivating social ties or attaining inner peace—appears not to correlate positively, and in many instances appears to correlate negatively, with happiness.<sup>74</sup> It is what is in the adherent's mind, rather than religion's

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and actual friends and supporters is a . . . community-inclusion focused, perspective commonly invoked to explain the findings." (citation omitted)); Stark & Maier, *supra* note 18, at 123, 125 (noting that "the effects of religion seem to be primarily 'social' rather than doctrinal . . . A number of scholars have suggested that . . . the major effect of religion on happiness is achieved by embedding people in supportive congregations where they enjoy warm social relationships."); Witter et al., *supra* note 38, at 336–37 ("[R]eligion affects subjective well-being more strongly via the influence of social integration as compared to ego transcendence. However, the interrelationships among social integration, religious participation, and religiosity may be complex.").

<sup>70</sup> See Eichhorn, *supra* note 30, at 584–85 (explaining the correlation between religious communities and social support). See generally KOENIG ET AL., *supra* note 65 at 458–61 (identifying the positive effects of social support from religious organizations).

<sup>71</sup> See, e.g., Luke William Galen & James D. Kloet, *Mental Well-Being in the Religious and Non-Religious: Evidence for a Curvilinear Relationship*, 14 MENTAL HEALTH, REL. & CULTURE 673, 681 (2011) ("[M]embers of a cohesive group will display greater emotional stability to the extent that they are actively involved in a supportive social milieu.").

<sup>72</sup> See Marks, *supra* note 59, at 176 ("[Religion] impacts psychological coping through social, emotional, and moral support a faith community can provide, particularly in times of stress, crisis, or bereavement." (citation omitted)).

<sup>73</sup> See *infra* Part IV.B (considering possibly that the religion-happiness connection owes predominantly to the social connections that religious involvement facilitates).

<sup>74</sup> Kristopher J. Gauthier et al., *Religiosity, Religious Doubt, and the Need for Cognition: Their Interactive Relationship with Life Satisfaction*, 7 J. HAPPINESS STUD. 139, 140 (2006). Gauthier et al. stated:

practical value, that principally accounts for the religion-happiness connection.<sup>75</sup>

To be sure, this does not definitively discredit the notion that religion properly understood should be emancipated from particularistic dogma. There is much to commend a conception of religion that seeks to harness religion's utility while shedding the zealotry and parochialism. But such a conception does not pave the way to personal happiness—societal amity and understanding, perhaps, but not individual happiness.<sup>76</sup>

That it is authentic conviction, rather than religion's ancillary social or personal value, that undergirds the religion-happiness nexus tells us little about what sort of belief we should prefer if we desire happiness. Perhaps the elastic faith of the mainstream—the sort that tolerates and even encourages doubt—conduces best to happiness. After all, such faith is generally undemanding, forgiving of waywardness, and less

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[E]xtrinsic religiosity (i.e., engaging in religion for external incentives such as social contacts), was negatively correlated with several indicators of mental well-being, including appropriate social behavior, freedom from worry and guilt, personal competence and control, and open-mindedness and flexibility. Conversely, intrinsic religiosity (i.e., engaging in religion to integrate it into one's daily affairs) was positively correlated with appropriate social behavior, freedom from worry and guilt, a sense of personal competence and control, and personality unification and organization.

*Id.*; Karen Hwang, Joseph H. Hammer & Ryan T. Cragun, *Extending Religion-Health Research to Secular Minorities: Issues and Concerns*, 50 J. REL. & HEALTH 608, 609 (2011) ("People also attend church services for a variety of reasons—e.g. for the social network or out of familial obligation—not always having to do with actual worship."). "10% of Americans who do not believe in a god attend religious services weekly, not out of religious devotion, but rather for pragmatic reasons, like preserving familial harmony or to maintain a circle of friendships." *Id.* (citations omitted); see also Maltby, *supra* note 64, at 78 ("Generally, research suggests that an intrinsic orientation towards religion is associated with better mental health, while an extrinsic orientation toward religion is associated with poorer mental health.").

<sup>75</sup> See Eichhorn, *supra* note 30, at 583 ("[I]ntrinsic and extrinsic forms of religiosity differently affect the level of life-satisfaction. Attitudinal evaluations of personal levels of religiosity tend to be positively associated with measures of subjective well-being. However, the same is not true for practiced aspects of religiosity, pointing to the relevance of distinguishing different mechanisms." (citations omitted)); Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 105 ("Hadaway and Roof concluded: '... [I]t would appear that meaning is the more distinctively religious resource. Not that religious belonging is unimportant, but the social integration it provides also can be provided by other voluntary organizations.'"); see also Marks, *supra* note 59, at 179 ("[T]he importance of one's faith had the strongest association with positive mental health, even after controlling for the effect of other significant variables, age and education... highlighting attitudes rather than practices, as the stronger spiritual variables related to mental health...").

<sup>76</sup> See *infra* Part V (discussing the "growth-doubt" nexus).

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prone to saddling its adherents with overpowering guilt.<sup>77</sup> Who indeed should wish upon herself the rigors and anxieties of rigid fealty to religious doctrine? She who seeks happiness should.<sup>78</sup>

*B. The Perils of Doubt, the Virtues of Certainty*

Having established that it is genuine belief and not religion's extrinsic value that underlies the religion-happiness connection, we move to the substance of that belief. What sort of conviction begets happiness—the temperate, flexible faith of the religious liberal or moderate, or the unbending, confident dogmatism of the fundamentalist? A growing literature suggests the latter.<sup>79</sup> Indeed, not only does religious doubt neutralize religion's salutary effect on happiness, it tends to reverse it.<sup>80</sup>

The empirical literature reveals an intriguing pattern—the religion-happiness relationship appears to be non-linear.<sup>81</sup> More religion, it

<sup>77</sup> See Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 103–04 (“Studies of denominational growth and decline have distinguished between ‘strong’ and ‘weak’ denominations on the basis of their respective levels of internal pluralism, distinctiveness of lifestyle, social action, evangelism (sense of mission), ecumenicism, and other denominational traits.”). “[S]trong’ or conservative churches [demand] high levels of loyalty and social solidarity, [] disciplining both beliefs and lifestyle, and [] fostering dogmatic absolutism.” *Id.* (citations omitted).

<sup>78</sup> See *supra* Part III.B (explaining that strong conviction begets happiness).

<sup>79</sup> See Weber et al., *supra* note 34, at 80 (describing the link between fundamentalism and well-being). Weber describes this link as follows:

[S]trength of conviction, be it atheistic or religious, correlates with improved psychological health. Degree of inner conviction is associated with degree of well-being: for example, strong atheistic beliefs are comparable to strong religious beliefs in helping people cope with the challenges of aging []. Christians with high levels of religious saliency have significantly lower levels of depressive symptoms.

*Id.* (citations omitted); see also Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 117 (finding important net effects of devotional intensity); see, e.g., Abdel-Khalek, *supra* note 68, at 87 (“[P]eople, who are religiously devout and committed to their tradition, . . . tend to enjoy better health both physical[ly] and mental[ly].” (citations omitted)); Hayward & Elliott, *supra* note 32, at 593 (“Having more orthodox religious beliefs has also been shown to be associated with better outcomes in terms of psychological well-being . . .”).

<sup>80</sup> See Ellison et al., *Religious Doubts*, *supra* note 31, at 121 (“[A]lthough most work on religion and health has focused on salutary effects on health, there is now evidence that certain facets of religious engagement—termed ‘spiritual struggles’—can undermine health and well-being.”).

<sup>81</sup> See Weber et al., *supra* note 34, at 80 (examining the connection between lower levels of religious certainty and decreased well-being). Weber explains:

Just as greater conviction correlates with better health, less certainty of belief has been associated with decreased well-being. Religious

seems, does not necessarily make a happy believer.<sup>82</sup> Indeed, the religion-happiness connection appears to be “curvilinear,” with happiness declining as religiosity initially increases and rising after religiosity exceeds a certain threshold.<sup>83</sup> While religious fundamentalists tend to be highest on the happiness continuum, religious liberals and moderates appear not to be any happier than agnostics.<sup>84</sup> Perhaps most

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adherents with low certainty of belief may be less happy than non-believers, with 47.3% of religious respondents to an online study reportedly less happy than atheists, 21.9% less happy than agnostics, and 14.4% less happy than those with no religious affiliation.

*Id.* (citation omitted).

<sup>82</sup> See Marta Elliott & R. David Hayward, *Religion and Life Satisfaction Worldwide: The Role of Government Regulation*, 70 SOCIOLOGY OF RELIGION 285, 288 (2009) (“[I]n certain instances, religiosity is actually harmful to psychological well-being. . . . [A] U-shaped relationship between religious salience and depression, indicating that those who felt their religion was ‘not too important’ or ‘very important’ report higher levels of depression than those in between the two extremes. . . . [T]hose who were not at all religious or very religious had lower levels of depression than those found in the middle . . .”) (citations omitted); see also Mochoy et al., *supra* note 59, at 2 (“While those who believe strongly are very happy, those who believe weakly are less happy and may even be hurt by their affiliation [with] a religious group.”).

<sup>83</sup> See Galen & Kloet, *supra* note 71, at 675 (“[T]he highest levels of distress [were] in the weakly religious; the highly religious as well as the non-religious were the least distressed.”). Galen and Kloet elaborate:

In a sample of German adults, a curvilinear relationship was found between religiosity and depression with both the strictly religious and ‘determined atheists’ scoring as the least depressed. . . . Similarly, [researchers have] found a curvilinear relationship between religious conviction and depression. Certainty of beliefs (either strong religiousness or confident non-religiousness) was associated with better mental and physical health . . . Several other authors have also found complex curvilinear relationships between religiosity and mental health by clearly separating the weakly religious and completely non-religious.

*Id.* (citations omitted).

<sup>84</sup> See *id.* at 681 (analyzing the link between strength of religious beliefs and emotional stability). This link is described as follows:

Similar to previous literature, those with more certain religious beliefs, either strong belief in God or strong lack of belief in God, had greater emotional stability than those with weak or unsure beliefs. Those highest in life satisfaction were both the strong believers *and* the strong non-believers, with the uncertain scoring intermediately. The regression analysis demonstrated that, although some demographic or social covariates (sex, age, social contacts, and perceived social support), are also related to emotional stability, the curvilinear function of certainty of belief remained after controlling for these covariates and contributed small but significant incremental prediction.

*Id.* Mochoy expands on this link:

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revealing, atheists tend to be higher on the happiness scale than do religious liberals and moderates, although their happiness levels do not quite rise to the level of fundamentalists.<sup>85</sup>

Still, religious moderation does not entail religious doubt; nor does religious fundamentalism entail religious certainty. We should not assume that religious liberals and moderates are uniformly uncertain of their convictions while atheists and fundamentalists are monolithically free of doubt. Nonetheless, the evidence supports the natural intuition that, while the dogmatic Unitarian and the doubt-ridden fundamentalist exist, they are rare breeds indeed.<sup>86</sup> As such, there is scant evidence from which to glean any conclusions regarding the primacy of epistemological certainty over denominational ties or vice versa. Nonetheless, research that more directly assesses the impact of doubt on happiness confirms its

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The most fervent believers clearly benefit from their religious affiliation. People with religiosity levels of six and seven reported significantly higher well-being than the reference group (those with religiosity of one). However, people with levels of four and five showed no benefit over the least religious people in our sample, and in fact, people with moderate to low adherence (those with levels of two and three) showed a significantly negative effect of religiosity. Thus[,] while religious involvement clearly benefits some (the most fervent believers) it can also be detrimental to others.

Mochon et al., *supra* note 59, at 8.

<sup>85</sup> See Galen & Kloet, *supra* note 71, at 685 (“[T]hose with high certainty of non-belief had greater mental well-being than those with moderate or unsure beliefs. . . . [T]hose with confident religious belief and disbelief reporting higher mental well-being than the uncertain believers. Those non-religious subgroups with more definitive self-labels (atheist and humanist) had greater well-being than the self-labels associated with less categorical non-belief (agnostic, spiritual).”); Hwang, *supra* note 74, at 613 (“[I]nvestigators have found that strong atheists are no more likely to be depressed than strong believers, and are less depressed than weak believers or wavering agnostics.” (citations omitted)). Other scholars suggest that:

Were we to place our own children in the distribution of religiosity, the option with the highest expected well-being would entail enrolling them and encouraging them to believe strongly; were we not certain that our children would attain sufficient levels of belief, however, we might prefer them to remain unaffiliated. Indeed, the non-linear relation between religiosity and well-being suggests that many moderate believers would benefit from reducing their level of religiosity rather than increasing it.

Mochon et al., *supra* note 59, at 10–12.

<sup>86</sup> See Jenny L. Small & Nicholas A. Bowman, *Religious Commitment, Skepticism, and Struggle Among U.S. College Students: The Impact of Majority/Minority Religious Affiliation and Institutional Type*, 50 J. FOR SCI. STUDY RELIGION 154, 158 (2011) (“Unitarians, Jews, and students with no religious affiliation score highly on a measure of religious skepticism, whereas Mormons, Seventh Day Adventists, Baptists, and ‘other Christians’ score much lower.”). See generally PEW FORUM ON RELIGION & PUBLIC LIFE, U.S. RELIGIOUS LANDSCAPE SURVEY 1 (2007) (presenting survey responses to the question “All in all, are you satisfied or dissatisfied with the way things are going in this country today?”).

corrosive influence.<sup>87</sup> Persistent doubt tends to reverse religion's generally salubrious effect on happiness.<sup>88</sup> The doubt-plagued report a higher incidence of anxiety and depression, evince more negative affect, and experience diminished feelings of satisfaction and purpose relative to more stalwart believers.<sup>89</sup> She who seeks happiness, it seems, should opt for resolute faith or confident non-belief. Nuance and flexibility, an

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<sup>87</sup> See Gauthier et al., *supra* note 74, at 141 ("[R]eligious doubt was negatively correlated with positive affect, and positively correlated to depression, suggesting that religious doubt does not display any visible benefits to mental health."); Neal Krause & Christopher G. Ellison, *A Longitudinal Study of the Precipitants and Consequences of Religious Doubt in Older Adults*, 48 J. FOR SCI. STUDY RELIGION 293, 293 (2009) ("[G]reater religious certainty is associated with greater happiness and greater life satisfaction."); Weber et al., *supra* note 34, at 73 ("Religious doubt and feelings of alienation from God have been associated with increased depressive symptoms." (citations omitted)). Ellison and his colleagues summarize previous findings as follows:

Ellison [] showed that the absence of doubts—which he characterized as 'existential certainty'—was positively associated with life satisfaction and happiness in a cross-sectional probability sample of U.S. adults. . . . Krause and associates [] found that religious doubts were linked with both positive and depressed affect (in opposite directions). . . . Krause and Wulff [] showed that religious doubting was associated with lower levels of satisfaction with health, as well as higher levels of distress. . . . Galek and colleagues [] examined data from a nationwide online survey, finding that religious doubts were positively related to symptoms of a number of mental health problems . . . including depression, anxiety, phobia, paranoia, and hostility. . . . [O]ur results confirm several robust associations between religious doubts and poor sleep quality. These associations persist despite controls for an array of sociodemographic and behavioral covariates, including age, mental and physical health, stressful life events, attendance at religious services, frequency of prayer, and attachment to God.

Ellison et al., *Religious Doubts*, *supra* note 31, at 122–23, 130 (citations omitted); see, e.g., Neil Krause et al., *Aging, Religious Doubt, and Psychological Well-Being*, 39 GERONTOLOGIST 525, 532 (1999) [hereinafter Krause, *Aging*] ("[R]eligious doubt is associated with greater depressive symptomatology and less positive affect.").

<sup>88</sup> See Krause & Wulff, *supra* note 44, at 39 ("[I]f people are more deeply immersed in religion, and they seriously question their faith, then the effects of doubt are likely to be more consequential."). "[T]hose who occupy formal roles in the church should be more troubled by religious doubts because doubt threatens roles and identities that are highly salient to them." *Id.* at 40; see Weber et al., *supra* note 34, at 73 ("Religious doubt [] and feelings of alienation from God [] have been associated with increased depressive symptoms." (citations omitted)).

<sup>89</sup> See Ellison et al., *Religious Resources*, *supra* note 18, at 290 ("[U]nresolved doubts can be profoundly disconcerting for religious adherents. Doubts can deprive the individual of a coherent religious belief system and sense of coherence, which otherwise provides a means of interpreting and assigning meaning to daily affairs and personal crises alike."). "[R]eligious doubts are associated with elevated levels of psychological distress and psychiatry symptoms, and inversely associated with life satisfaction and other indicators of well-being." *Id.* (citations omitted).

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earnest attempt to marry faith and free inquiry—these may be the hallmarks of the mature, enlightened believer. But they do not appear to light the path to happiness.

These findings accord with the theoretical literature discussed above. While the comparatively tepid faith of mainline denominations demands less of and more readily forgives its followers, such elasticity comes at the price of epistemological order.<sup>90</sup> Whereas the more zealous faith of the religiously devout accords its devotees a comprehensive epistemological architecture with which to interpret phenomena, the faith of the epistemologically unsure is more scaffolding than solid edifice—a general framework perhaps, but riddled with gaps and vulnerabilities.<sup>91</sup> As discussed above, attachment and ETAS theorists posit that human beings seek stability and security in a perilous, uncertain world.<sup>92</sup> Inasmuch as religious certainty satisfies our basic desire for order and coherence, it should make us less anxiety-prone, more optimistic, and better able to function in daily life. The empirical

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<sup>90</sup> See Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 103 (“Religious experience and/or personal faith—devotional intensity—may facilitate a comprehensive interpretive framework through which the individual can make sense of the totality of human existence and its vicissitudes.”).

<sup>91</sup> Ellison, *Religious Involvement*, *supra* note 16, at 82. “The literature on contemporary patterns of denominational growth and decline distinguishes between ‘strong’ conservative Protestant groups and ‘weak’ mainline and liberal Protestant churches.” “[Strong denominations] require higher levels of organizational commitment and social solidarity. . . . distinctive lifestyles and behavioral conformity.” *Id.* “[T]hey foster absolutism and ideological closure rather than pluralism and tolerance, [and as such] are more effective than weaker churches in sustaining coherent systems of religious meaning.” *Id.* (citations omitted); see Galen & Kloet, *supra* note 71, at 686 (examining the relationship between mental health and religious involvement). Galen & Kloet describe this relationship as follows:

Rather than specifically religious content being a prerequisite for mental well-being, it is likely that existential certainty or coherence of a worldview mediates the relationship between religious participation and mental health. For example, system justification theory, the belief in a just world, and terror management theory all suggest that ideological confidence in a coherent worldview may buffer anxiety, and that religious belief may assist in increasing this confidence. . . . Conversely, doubting one’s worldview is associated with higher distress.

*Id.* (citations omitted); see also Gribbins & Vandenberg, *supra* note 53, at 106–07 (“[Religion] is in essence a ‘meta-belief’ or worldview. This worldview provides an absolute foundation for determining what is and what should be, what is good and evil, and what is known and unknowable, which are conferred by an omniscient, omnipotent being.” (citations omitted)).

<sup>92</sup> See *supra* Part II.A (explaining that humans seek to neutralize external threats by cultivating an attachment with God).

evidence corroborates this intuition.<sup>93</sup> Religious doubt, by contrast, erodes the epistemological anchor that religion provides. It creates lacunas in an interpretive framework that for fundamentalists operates as a ready, comprehensive guide to an unstable universe.<sup>94</sup> As such, attachment and ETAS theories predict precisely the results recounted above—albeit with two notable caveats. First, ETAS theory predicts that religion should yield psychological benefits only when it neutralizes threats to human welfare.<sup>95</sup> A capricious, vindictive God should generate the opposite effect, a point this Article will address later.<sup>96</sup>

The second caveat is more complicated—at first blush, attachment and ETAS theories do not account for the contented atheist. Why should belief in the non-existence of God buoy one against the hazards and uncertainties of human existence? Although empirical work on the belief systems of atheists is sparse, it seems clear that atheists are generally not devoid of conviction.<sup>97</sup> Many have highly developed worldviews that they embrace as unreservedly as the fundamentalist

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<sup>93</sup> See Elliott & Hayward, *supra* note 82, at 287–88 (“[A] sense of a direct connection with the divine was associated with greater life satisfaction.”); Ellison et al., *Religious Doubts*, *supra* note 31, at 123 (“[R]eligious doubts can result in feelings of powerlessness, hopelessness, worry and fear, which may in turn trigger the release of stress hormones that promote mental and physiological arousal.” (citations omitted)); Thurow, *supra* note 25 (“[S]tudies [have found] support for the notion that a close relationship to God (or a higher source) positively relates to health and well-being . . .”).

<sup>94</sup> See Ellison, *Religious Involvement*, *supra* note 16, at 82 (“A leading proponent of this view is Berger, who argues that religion offers a comprehensive framework for the ordering and interpretation of human events. Thus, in the context of strong beliefs regarding matters of ultimate concern, seemingly routine personal affairs may take on particular meaning and significance.”).

<sup>95</sup> See *supra* Part II.A (explaining how a loving God offers safety and stability).

<sup>96</sup> See *infra* Part VI (explaining the reliance of the poor and uneducated on religion).

<sup>97</sup> See Jonathan Morgan, *Untangling False Assumptions Regarding Atheism and Health*, 48 ZYGON 9, 15 (2013) (“[P]erhaps the strongest critique of this link between health and belief is the paucity of research on nonbelievers.” (citation omitted)). “[A]theists are [] more prone to find their meaning in ‘this world.’ [Many] have argued that secular nonbelievers ‘have a stronger sense of social justice than do religious individuals.’” *Id.* at 14 (citation omitted). Hwang suggests that:

[Conventional] measures are unable to reliably distinguish between individuals with affirmatively secular worldviews and those believers whose belief systems are vague, transitory[,] or conflicted. . . . [W]e encourage further investigation of the medical and psychosocial assets of *affirmatively secular* individuals (as opposed to the ‘nonreligious’). Particularly relevant are studies identifying the *strengths and benefits* associated with an explicitly secular world view, especially the ways in which a secular world view can *enhance* a person’s overall health and quality of life.

Hwang, *supra* note 74, at 612, 617.



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does scripture.<sup>98</sup> To the extent this holds true, the happy atheist is explicable from an attachment standpoint—as with the fundamentalist, a comprehensive ideational framework offers a buffer against moral and intellectual chaos.<sup>99</sup> ETAS theory provides little insight here, however—that is, unless the atheist’s worldview involves some threat-neutralizing mechanism, which seems doubtful. In any case, we need not rely on attachment or ETAS theories to explain the happy atheist—or for that matter, the curvilinear relationship between religion and happiness. Indeed, the theory of cognitive dissonance illuminates these phenomena.<sup>100</sup>

The human aversion to cognitive dissonance more directly accounts both for the contended atheist and for the curvilinear relationship between religion and happiness.<sup>101</sup> Where agnostics and religious moderates often remain stranded between the poles of faith and non-belief, atheists and fundamentalists need not endure this psychic struggle.<sup>102</sup> They can rest comfortably at one extreme or the other, sparing themselves the energy and anguish that come with efforts to harmonize beliefs or behaviors.<sup>103</sup> They avoid the moral and intellectual limbo to which a more nuanced stance might condemn them.

Reconciling these findings with terror management theory sheds valuable light on the psychological advantages of epistemological certainty. From a terror management standpoint, the curvilinear relationship between religion and happiness and the phenomenon of the

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<sup>98</sup> See Galen & Kloet, *supra* note 71, at 675 (“Those with a self-identity as atheists may focus more on a narrower rejection of religious claims but others who self-identify as secular humanists may also include affirmations of human progress or growth.” (citation omitted)).

<sup>99</sup> See *id.* at 686 (“It may be the case that confidently non-religious individuals have a committed worldview, with meaning derived from relationships, science, philosophy, or the arts in an analogous way to a religious individual deriving meaning from religious beliefs.”).

<sup>100</sup> See *supra* Part II.C (explaining the theory of cognitive dissonance).

<sup>101</sup> See Galen & Kloet, *supra* note 71, at 674 (“Holding beliefs with strong conviction may itself exert a salutary effect and reduce anxiety caused by cognitive dissonance. For example, in the absence of subjective certainty, people often experience a state of psychological aversion that they are motivated to reduce.”).

<sup>102</sup> See Weber et al., *supra* note 34, at 82 (“Interestingly, there appears to be a correlation between strength of conviction in one’s religious (or nonreligious) worldview and psychological well-being. This correlation is supported by findings connecting greater existential certainty with decreased depressive symptoms.” (citations omitted)).

<sup>103</sup> See *id.* at 83 (“[A] bimodal relationship [appears to exist] between religiosity and health, with the greatest health experienced by the most and least religious individuals. . . . [S]trong atheists appear to enjoy the same psychological benefits as strongly religious individuals.”).

happy atheist may seem anomalous.<sup>104</sup> Insofar as agnosticism and moderate religiosity allow for the possibility—if not the probability—of immortality, they should allay rather than intensify our terror of death. As such, terror management theory would predict a linear relationship between religion and happiness. But here we must recall that the human desire for immortality is not confined to immortality in the conventional religious or celestial sense.<sup>105</sup> Rather, our dread of death engenders a more general impetus toward meaning and permanence.<sup>106</sup> If atheists are more likely than agnostics or religious moderates to develop comprehensive worldviews—in the form of a resolute commitment to secular humanism or scientific thinking, for example—then terror management theory would predict a decline in happiness as one initially ascends the religiosity scale, followed by a rise as comprehensive worldviews reemerge at a certain religiosity threshold. Such worldviews come with ideals that outlast the individual and imbue her with meaning, purpose, and a sense of permanence in the face of her mortality.<sup>107</sup> To undermine them is to erode a powerful buffer against our terror of death.

#### IV. CUES TO DOUBT: DISSONANT STIMULI AND CHALLENGES TO EPISTEMOLOGICAL CERTAINTY

How do we preserve this powerful psychological palliative when the world constantly besets us with reminders of the cracks in our epistemological armor? We observe that others manage to resist our systems of meaning and belief, that they embrace diametrically opposed worldviews, and that the world is full of uncomfortable facts that throw

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<sup>104</sup> See *supra* Part II.B (discussing the theory that belief in an afterlife conduces the happiness).

<sup>105</sup> See *id.* (explaining that people seek meaning and performance from their belief systems generally, regardless of whether their belief systems are religious in nature).

<sup>106</sup> See Morris & McAdie, *supra* note 33, at 116 (“Terror Management Theory (TMT) states that humans have a very deep fear of death and have created ‘cultural world views’ such as belief in the afterlife (BA) to control this anxiety. TMT has been supported by research which shows that subjects will score higher on a BA scale following exposure to a death threat condition.” (citation omitted)).

<sup>107</sup> See Julie Juola Exline, *Stumbling Blocks on the Religious Road: Fractured Relationships, Nagging Vices, and the Inner Struggle to Believe*, 13 PSYCHOL. INQUIRY 182, 186 (2002) (“Religious beliefs help people to make sense of the world and to find a sense of meaning or purpose in existence. In fact, this meaning-making aspect of religion seems to be one the major mediators of the association between religion and health.” (citation omitted)); *supra* Part II.B (explaining that, when faced with mortality, people have a strong desire to reinforce their cultural and political values).

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our epistemologies into chaos. How do we cope with external cues to doubt our convictions?<sup>108</sup>

If epistemological certainty underlies the religion-happiness nexus, we would expect such cues to attenuate that nexus. The evidence indeed suggests that such stimuli weaken, destroy, or even reverse religion's salutary effect on happiness. Researchers have found, for instance, that the religion-happiness nexus all but evaporates in comparatively irreligious societies, where the faithless appear to be roughly as contented as the faithful.<sup>109</sup> In this same vein, religious diversity appears to undermine the relationship between religion and happiness.<sup>110</sup> The following section elaborates on the role that conformity with social norms plays in the religion-happiness nexus.

#### A. A Conformity Effect?

Might these findings reveal a simple conformity effect? That is, might the religion-happiness nexus owe to the comfort of knowing that one is not alone or aberrant, such that the roots of the nexus are external to epistemology?<sup>111</sup> This appears unlikely. Indeed, it seems more

<sup>108</sup> See Harmer-Dionne, *supra* note 48, at 1316 ("Festinger posited that, to reduce dissonance, one may change one's own behavior, change one's environment, or most drastically, change the very cognition (i.e., belief or opinion) that is in conflict with the behavior or the environment[.]" (footnote omitted)); Bertram Gawronski, *Back to the Future of Dissonance Theory: Cognitive Consistency as a Core Motive*, 30 SOC. COGNITION 652, 653 (2012) ("[I]nconsistency serves as an epistemic cue for errors in one's system of beliefs, thereby imposing a ubiquitous constraint on thinking and reasoning that goes far beyond the well-known demonstrations of dissonance-related attitude change.").

<sup>109</sup> See Diener et al., *supra* note 29, at 1289 ("Our analyses suggest that individual religiosity is most beneficial to [subjective well-being] when it is congruent with the culture, that is, if religion is widespread in the society. Where organized religiosity is in the minority, religiosity does not have a clear benefit for [subjective well-being]."); Adam Okulicz-Kozaryn, *Does Religious Diversity Make Us Unhappy?*, 14 MENTAL HEALTH, RELIGION & CULTURE 1063, 1063, 1070 (2011) ("Religious people are happier than nonreligious people in religious countries, but not necessarily in non-religious countries. . . . People like to live among like-minded individuals—religion provide[s] social identity—and the need to belong is one of the most fundamental human needs." (citations omitted)).

<sup>110</sup> See Okulicz-Kozaryn, *supra* note 109, at 1064 ("[R]eligious diversity makes us unhappy. . . . Religious diversity retards church participation, and church participation is the form of religiosity that contributes most to well-being, because it promotes social capital." (citations omitted)).

<sup>111</sup> See Eichhorn, *supra* note 30, at 590 (considering the effect of religious cultures on life satisfaction). One scholar suggests that:

[P]eople tend to experience life-satisfaction enhancing effects when they place higher importance in god while living in a country where attendance of religious services is higher. These findings suggest that positive effects of religiosity may not be intrinsic. For the countries sampled, people do not appear to be happier, because they,

probable that conformity reinforces epistemological certainty, which in turn promotes happiness. Recall the curvilinear relationship between religion and happiness.<sup>112</sup> Americans evidently do not hold those at the extremes of the belief spectrum—those who appear to occupy the upper strata of the happiness continuum—in particularly high esteem. Atheists in particular are the objects of perhaps uniquely powerful scorn, yet they appear relatively contented.<sup>113</sup> Mormons and Jehovah's Witnesses are hardly comfortable within the mainstream, yet these groups excel at attaining happiness.<sup>114</sup>

These realities belie the conformity hypothesis. It is worth noting, however, that any analysis of a potential conformity effect requires that we first identify the relevant unit to which the individual would feel pressure to conform. Society at large may not be the appropriate metric. Rather, atheists and devout believers might inhabit social circles to whose norms they faithfully conform—circles whose approbation they seek far more keenly than that of mainstream society.

Ultimately, we may be able to trace the religion-happiness nexus to the effects of both epistemological certainty and conformity.<sup>115</sup> Perhaps

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individually, are more religious. People who place a higher importance in god, however, are happier when they live in a country where others do as well. . . . [I]t appears to be that happiness through religiosity can mainly be derived through conforming to the standard in their country—in particular the visible standard.

*Id.*

<sup>112</sup> See *supra* Part III.B (explaining that atheists and individuals with extreme religious beliefs are happier than those who experience significant epistemological doubt).

<sup>113</sup> See Weber et al., *supra* note 34, at 81 ("In response to a nationwide telephone survey, a large number of Americans stated that they were likely to disapprove of their children marrying atheists, and many felt that atheists were the group ' . . . least likely to share their vision of American society.'" (citation omitted)). "One [study] indicated that . . . disapproval placed atheists at the top of Americans' list of problematic groups, representing levels of public rejection higher than that of Muslims in post-9/11 America." *Id.* at 83 (citation omitted).

<sup>114</sup> See Ellison, *Religious Involvement*, *supra* note 16, at 91 ("With regard to the Mormons and Jehovah's Witnesses, the pattern of results is consistent with recent research on other aspects of well-being."). "It seems likely that conformity to the distinctive lifestyle demands of these groups . . . may reduce the occurrence of health problems, interpersonal and familial tensions, and other personal stressors." *Id.*

<sup>115</sup> See Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 103 ("[T]he religious community may serve as a 'plausibility structure.' Ideation and activity may be dialectically related, with religious participation reinforcing and solidifying individual religious convictions and the subjective interpretations of personal experiences." (citation omitted)). According to Robert Higgs:

[A]s people internalize 'the values and precepts of their communities of shared belief, [they] not only feel better about themselves but become trustworthy adherents who will act in accordance with their ideology without, or even in opposition to, external material

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we cannot even disentangle the two. Conformity might reinforce epistemological certainty, for the conformer need not cope with the disquieting presence of so many heretics in her midst. But epistemological certainty might also strengthen a sense of conformity to prevailing norms.<sup>116</sup> Researchers have not yet squarely attempted to disaggregate these variables and determine which more proximally impacts happiness. Still, there is compelling evidence that epistemological certainty positively affects happiness, and the possibility of an alternative explanation—in particular one that dovetails with an epistemological certainty effect—does not negate the force of that evidence.

*B. Conformity as Plausibility*

Here, it is worth returning to the hypothesis that the religion-happiness connection owes predominantly to the social connections that religious involvement facilitates. I asserted earlier that, in light of the finding that extrinsic religiosity does not correlate with happiness, this theory likely misconceives the role of social ties in the religion-happiness calculus.<sup>117</sup> It seems more probable that such connections function as “plausibility structures,” ratifying one’s epistemology through the

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enticement,’ a state of being which provides even greater self-esteem. The social isolation of ideologically homogenous groups ultimately produces extralegal cooperation and allows these groups to produce collective benefits not otherwise available.

Harmer-Dionne, *supra* note 48, at 1314 (footnote omitted). See also Hayward & Elliott, *supra* note 32, at 604 (“[T]here is strong support for the idea that being similar to other members of one’s religious groups . . . is beneficial for individual well-being . . . . This holds up for demographic characteristics, religious values and preferences, devotional behavior, and participation within the congregation.”). “[T]he number of other members in the same congregation who checked the same values as important was a strong predictor of both the degree to which an individual’s spiritual needs were met and the amount of help provided by religion in daily life.” *Id.*

<sup>116</sup> See Harmer-Dionne, *supra* note 48, at 1314 (“[P]eople internalize ‘the values and precepts of their communities of shared belief, they not only feel better about themselves but become trustworthy adherents who will act in accordance with their ideology . . . .” (footnote omitted)); Krause and Wulff, *supra* note 44, at 39 (“[S]hared behavioral expectations associated with social roles promote a sense of meaning and purpose in life. This function is important because research consistently shows that a life that is experienced as meaningful is an important precursor to well-being.” (citations omitted)). See also Krause & Ellison, *supra* note 87, at 296 (“An individual’s confidence in religious explanations is strengthened to the extent that others express their confidence in them.” (citation omitted)).

<sup>117</sup> See Ellison, *Religious Involvement*, *supra* note 16, at 89 (“[W]hereas most previous research in this area focused on church attendance and private devotion, the pattern of results presented here suggests that these aspects of religiosity contribute to well-being indirectly, for the most part, by strengthening religious beliefs and world views.”).

collective assent of one's peers.<sup>118</sup> External cues to doubt one's epistemology—religious diversity or prevalent unbelief, for instance—open fissures in these plausibility structures, attenuating the religion-

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<sup>118</sup> See Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 115 ("[The results suggested] the relative primacy of those religious factors that are not specific to any one particular denomination or sect. However, two denominations are exceptions[]: Southern Baptist and 'Other Baptist.'"). "The persistent importance of membership in the Southern Baptists, the sole fundamentalist denomination identifiable from these data, may be best interpreted in light . . . of religious 'plausibility structures' . . . The link between the strong plausibility structure of more conservative denominations and well-being may . . . diminish existential ambiguity or ambivalence[.]" *Id.* at 115–16. Ellison also states:

Coherent religious belief systems can shape one's fundamental assumptions about the world and one's place within it. Such religious plausibility structures often provide an organizing principle via which one conducts routine affairs, defines role and performs responsibilities, and nurtures relationships. Thus, religious meaning systems may provide toolkits with which individuals make sense of daily events, major life changes, and traumatic crises.

Ellison et al., *Religious Doubts*, *supra* note 31, at 122 (citations omitted); *see also* Harmer-Dionne, *supra* note 48, at 1317 ("When in disagreement with others, one tends to reject those with whom one disagrees and seek out those who share similar cognitions. This social support, on an immediate level, tends to block the discomfort produced by dissonance with the larger society." (footnote omitted)). *See* Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 104 ("The solidarity and ideological reinforcement provided by a religious community embodying a relatively distinctive lifestyle and dogmatic homogeneity may constitute a subculture."). Ellison and colleagues further state:

In such a context, [the] dialectical relationship between beliefs and practices may provide a distinctive interpretive [] coherence not found in other communities. Conversely, to the extent that 'weak' churches (or denominations) are characterized by a tolerance of doctrinal heterodoxy, internal political dissent, and a pluralism of lifestyles . . . the absence of precisely such an all-encompassing interpretive framework seems likely. Thus, the character of plausibility structures may vary by denomination.

*Id.* (citation omitted); *see also* Ellison, *Religious Involvement*, *supra* note 16, at 81 ("Religious communities may promote fundamental norms regarding health behaviors, interpersonal and familial relationships, business dealings, and other dimensions of personal lifestyles that facilitate well-being. . . . Thus, the experience of worshiping in a group may reinforce private beliefs and may increase the centrality of religious interpretations of personal life experiences."). "[C]hurches and synagogues offer institutional settings and regular opportunities for social intercourse between persons of like minds and similar values." *Id.* (citations omitted). *Theory II* states:

The cultural anxiety-buffer is maintained largely through the consensual validation provided in cultural rituals and informal interactions with others. When people's beliefs and evaluations of themselves are shared by others, it increases the confidence with which those beliefs and evaluations are held . . . [W]hen others agree it provides a high level of consensus for the belief, which implies that the belief is externally determined and not a result of personal bias or perspective.

*Theory II*, *supra* note 37, at 309 (citations omitted).

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happiness connection.<sup>119</sup> Here, too, the possibility of a conformity effect remains—though the role of social ties throws into particularly sharp relief the futility of disentangling conformity from epistemological certainty.<sup>120</sup> Conformity buttresses epistemological certainty, which, in turn, bolsters the feeling of conformity.<sup>121</sup> Ultimately, the distinction between epistemological certainty and conformity may be more illusory than actual.<sup>122</sup>

## V. THE MATURE SKEPTIC: THE GROWTH-DOUBT NEXUS

This Article has attempted to show how epistemological certainty buoys one against instability and uncertainty, preserves a sense of ideational coherence, and shields one against the dread of death. But I must reiterate the caveat I issued earlier—this analysis is not a full-throated defense of religious or epistemological certainty, but rather a call to reckon with the perils of doubt.<sup>123</sup> Those perils are not dispositive.

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<sup>119</sup> See Okulicz-Kozaryn, *supra* note 109, at 1063 (“Religiosity improves well-being by providing so-called ‘plausibility structures.’” (citation omitted)). Okulicz-Kozaryn further explains these structures as follows:

Plausibility structure is more fundamental than social capital; it is a sociocultural context for systems of meanings and beliefs in a society. . . . People seem to be happiest living among like-minded others who share similar values and norms. . . . Religions differ in their explanations of the world, and there arises the question: which explanation is true?

*Id.* at 1063–64 (citations omitted).

<sup>120</sup> See Ellison, *Religious Involvement*, *supra* note 16, at 89 (“This study supports the view that religious symbols and beliefs provide an interpretative framework through which individuals can make sense of everyday reality.” (citation omitted)). “Further, the overall pattern of results suggests that the beneficent consequences of religious attendance and divine relations noted in previous work actually may reflect their roles in the creation and maintenance of religious plausibility structures.” *Id.* “[T]his theme has important roots in classical sociological theory: although Durkheim sometimes is interpreted as suggesting that religion promotes well-being mainly through social integration, closer examination clarifies his view that collective religious commitments nurture coherent plausibility structures[.]” *Id.* (citation omitted).

<sup>121</sup> See Ellison et al., *Does Religious Commitment Contribute*, *supra* note 36, at 103 (“A participatory dimension of religiosity may also be positively associated with life satisfaction . . . [because a religious institution] may provide an institutional setting in which individuals with shared value orientations can interact[.]”). “[T]he religious community may serve as a ‘plausibility structure.’ Ideation and activity may be dialectically related, with religious participation reinforcing and solidifying individual religious convictions and the subjective interpretations of personal experiences.” *Id.* (citation omitted).

<sup>122</sup> See Small & Bowman, *supra* note 86, at 170 (“[R]eligious commitment, religious engagement, and having friends with similar religious beliefs all build upon and contribute to one another.”).

<sup>123</sup> See *supra* Part I (maintaining that doubt has many virtues).

In the final analysis, we must weigh them against the societal toll that dogmatism exacts. That balance is beyond the scope of this analysis, which I have confined to the psychological impact of doubt on the individual. Even from the standpoint of the individual, however, the discussion thus far has painted an incomplete picture of psychological health. Are psychological well-being and happiness truly coterminous? What of personal growth, self-knowledge, and the capacity for interpersonal understanding? Might epistemological certainty promote happiness but stunt personal maturation? The evidence furnishes some support for this proposition.<sup>124</sup> I will move now to a discussion of this growth-happiness divide, but I urge the reader in advance to ponder whether a society of discontented sophisticates is indeed desirable.

#### A. *The Virtues of Doubt*

Liberal theologians and religious philosophers have long averred that faith and doubt reinforce each other in happy dialectical fashion.<sup>125</sup> Faith and doubt, they insist, are not antitheses—for true faith, the faith of the mature, self-aware believer, positively requires doubt.<sup>126</sup> In Paul Tillich's articulation, "[d]oubt is not the opposite of faith. It is an element of faith."<sup>127</sup> The faithful of modern sensibilities exhort us to attune ourselves to our innermost selves, to grapple with our deepest

<sup>124</sup> See *infra* Part V.A–B (discussing the effects of epistemological certainty on happiness and personal growth).

<sup>125</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 96 ("[S]ome theologians and researchers maintain that religious doubt should be embraced because it is the gateway to a deeper and more meaningful faith."). Krause elaborates:

In fact, some of these scholars argue that doubt is the very essence of faith itself. This perspective is, perhaps, nowhere more evident than in the writing of Paul Tillich, who . . . maintained that, 'Many Christians, as well as members of other religious groups, feel anxiety, guilt and despair about what they call 'loss of faith.' But serious doubt is confirmation of faith.' Similar views are reflected in the work of Allport . . . In fact, doubt is considered to be one of the driving forces behind Fowler's higher stages of the development of faith.

*Id.* (citations omitted).

<sup>126</sup> See Dale M. Hilty, *Religious Belief, Participation and Consequences, An Exploratory and Confirmatory Analysis*, 27 J. FOR THE SCIENTIFIC STUDY OF RELIGION 243, 244 (1988) ("Allport suggests that crises can have a positive influence on the evolutionary integration of the religious experience within the development of the personality." (citation omitted)). "[D]oubt is the key stimulus in the individual's movement from the first stage (i.e., raw credulity) to the last stage (i.e., mature belief) in Allport's three stage theory of belief development." *Id.* (citations omitted); see also Krause & Wulff, *supra* note 44, at 37 ("[Many] scholars maintain that having doubts about religion lies at the very heart of living a religious life, and that it is not possible to be deeply religious without having doubts about one's faith.").

<sup>127</sup> See PAUL TILlich, *SYSTEMATIC THEOLOGY VOLUME TWO* 116 (1957).



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doubts and insecurities.<sup>128</sup> In so doing, they insist, we achieve that rarefied state of serenity and self-knowledge accessible only after sustained struggle.<sup>129</sup>

The evidence suggests that religious doubt and struggle may well be a vehicle for personal growth, the path to a deeper, more complete personhood.<sup>130</sup> Those prone to such struggle report heightened interpersonal understanding, enhanced tolerance of others, and greater empathy.<sup>131</sup> Some emerge from the crucible of doubt with their faiths strengthened or reinvigorated, having fended off doubt's advances.<sup>132</sup>

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<sup>128</sup> See, e.g., Alpert, *supra* note 12 (arguing that effective teaching forces students to question assumptions); GORDON W. ALLPORT, *THE INDIVIDUAL AND HIS RELIGION* 73 (1951) ("[T]he mature religious sentiment is ordinarily fashioned in the workshop of doubt."); Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 106-07 ("Perhaps the point of wrestling with doubt is not to be content, satisfied, or happy—instead it may simply be to learn. . . . Maybe the exercise of doubting is sufficient . . . to bring about desired social aims, and . . . the resolution of ultimate concerns, such as confirming the existence of God, is beside the point.").

<sup>129</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 96 (examining the view that doubt is constructive). Krause explains:

[This] view . . . is based on the belief that faith is something that must be reflected upon and reasoned out. . . . [I]t is not something that is achieved effortlessly, . . . [but rather something that] must be earned through an arduous process of deep contemplation as well as relentless searching and questioning. This view is consistent with basic principles in developmental psychology, which suggest that cognitive development is driven by uncertainty and doubt. The essence of this perspective is reflected in the work of Batson and his colleagues on the religious quest[, who] maintain that openly and honestly exploring doubt about religion is beneficial because it ultimately leads to a deeper and more mature religious faith.

*Id.* (citations omitted). "[T]he notion that grappling with uncertainty or ambiguity is a positive force for personal advancement may be found in a number of the classic works on human development. . . . [I]mages of the positive effects of doubt may be found in Erikson's discussion of the final stage of adult development . . . ." Krause et al., *Aging*, *supra* note 87, at 527 (citation omitted).

<sup>130</sup> See Krause & Wulff, *supra* note 44, at 37 ("More recent support for the notion that doubt may be beneficial is found in the work of developmental psychologists, who maintain that growth and cognitive development are driven by doubt and uncertainty." (citation omitted)); Morgan, *supra* note 97, at 12 ("In Maslow's study of personality development he reported that nonbelief seemed to be correlated with the highest levels of development. Sociologists also support this positive view of nonbelievers: the highest levels of happiness are reported among the most secular nations." (citations omitted)).

<sup>131</sup> See Keith J. Edwards et al., *The Multidimensional Structure of the Quest Construct*, 39 J. OF PSYCHOL. & THEOLOGY 87, 88 (2011) ("[Q]uest scores correlated significantly with important social variables such as principled moral reasoning, lower levels of racial and sexual prejudice, and higher levels of helping behavior." (citation omitted)).

<sup>132</sup> See Tiago Baltazar & Ron Coffen, *The Role of Doubt in Religious Identity, Development, and Psychological Maturity*, 20 J. OF RES. ON CHRISTIAN EDUC. 182, 183-84 (2011) ("[I]dentity achievement refers to the state of a person who has both experienced crisis and achieved

These findings warrant attaching an asterisk to the thesis of this paper, but they by no means discredit it. This analysis has sought to illuminate the influence of epistemological certainty on happiness rather than to assess whether, all things considered, we ought to preserve epistemological certainty – and the weight of the evidence suggests that, while religious struggle may aid personal maturation, it does not breed happiness.<sup>133</sup>

*B. Religion as Quest*

Psychologists have operationalized Tillich's struggle-as-growth concept with the "religion-as-quest" construct, a measure of the extent to which one conceives of religion as an internal spiritual journey, a striving toward truth and understanding.<sup>134</sup> Such an orientation coincides with various benefits—enhanced compassion, greater facility in social settings, amplified curiosity and zest for intellectual pursuits.<sup>135</sup> But the bulk of the evidence suggests that "quest orientation" does not foster happiness; to the contrary, it correlates with anxiety, depression, and negative affect.<sup>136</sup> It appears that the thirst for truth and self-

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commitment based on the individual's own choosing. . . . Achieved people exhibit lower levels of anxiety and higher levels of self-esteem."). "Research concerning religious identity development shows that doubt is a catalyst for identity achievement. . . . [D]oubt increases higher-order executive processes [] to attain a self-drive for an individual who has a solid knowledge basis and can commit to certain religious principles." *Id.* at 187–88 (citations omitted).

<sup>133</sup> See Krause & Wulff, *supra* note 44, at 38 ("But just because doubt may lead to insight, growth, and development, does not necessarily mean that it comes without a price. In fact, there are at least four reasons why the 'dark nights of the soul' that arise from wrestling with doubt may be a source of significant distress."). Studies suggest "strong, church-based, social ties are associated with better health. But if individuals begin to question their faith, conflict may arise with church members who still adhere closely to their beliefs. . . . [Further,] rejecting beliefs that have been endorsed previously may lead to feelings of guilt and shame." *Id.* (citations omitted). "Although most work on religion and health has focused on the positive effects on health, there is now evidence that certain facets of religious engagement—termed 'spiritual struggles'—can be detrimental to health and well-being, leading to depression and anxiety." *Id.* (citations omitted).

<sup>134</sup> See Keith A. Puffer, *Social Personality Traits as Salient Predictors of Religious Doubt Phenomena Among Undergraduates*, 41 J. PSYCHOL. & THEOLOGY 229, 229 (2013) (describing the elements of a "religion-as-quest" orientation).

<sup>135</sup> See *id.* at 231 ("[S]tudies have revealed QRO as being positively associated with social justice actions among African-Americans, racial openness, responsible sexual behavior, and an unselfish love style." (citations omitted)). "[The] results reveal adept social intelligence and assertive leadership as predictive of 'openness, curiosity, and effort,' qualities of individuals engaged in 'a continual search for more light on religious questions.'" *Id.* at 236 (citations omitted).

<sup>136</sup> See *id.* at 231 ("Regarding intrapersonal functioning, quest religiosity positively related to mental health concerns such as worry and stomach pain, identity distress, and personal

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knowledge, so assiduously cultivated by our institutions of higher learning, comes at the price of psychic tranquility.<sup>137</sup>

Nonetheless, many religious adherents manage to integrate struggle and doubt into strong, vibrant faiths. Theirs is a sophisticated, mature religion, the sort Tillich exalts as the quintessence of genuine faith. But the composition of this group is revealing. The well-educated and financially secure excel at this melding of faith and doubt, while the less fortunate languish in a disorienting limbo.<sup>138</sup> Is epistemological doubt a luxury of the well-off?<sup>139</sup> Does it exact a peculiarly heavy toll on the most vulnerable among us?

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distress. QRO also negatively associated to positive affect, satisfaction with life, and overall college adjustment." (citations omitted)).

<sup>137</sup> See Krause et al., *Aging*, *supra* note 87, at 532 (considering the possibility that spiritual struggles sap one's energy). These scholars suggest:

[T]he attainment of wisdom may not come with ease and even though working through doubts and ambiguities eventually reduces negative psychological states, these gains may also incur certain costs. It is interesting to note that two of the four items in our positive affect scale deal with having pep and energy. Perhaps grappling with doubt reduces feelings of depression, but extracts a price at the same time by draining psychic energies.

*Id.* "Although anxiety, depression, and religious disinterest associate with quest religiosity, social savvy predicted QRO. Put simply, questers can possess mature social personality features—a social sophistication. Empathy [] empowers them to communicate efficiently, to discern the thoughts of others, and to feel affective reactions of others." Puffer, *supra* note 134, at 235 (citations omitted); see, e.g., Ronald C. Jones, *The Instructor's Challenge: Moving Students Beyond Opinions to Critical Thinking*, FACULTY FOCUS (July 29, 2013), available at <http://www.facultyfocus.com/articles/effective-teaching-strategies/the-instructors-challenge-moving-students-beyond-opinions-to-critical-thinking/>, archived at <http://perma.cc/7B7D-7VTS> (arguing that teachers must challenge their students' views and push them to think critically).

<sup>138</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 97 ("And the resources that are at an individual's disposal should play a major role in shaping how doubt is handled."). Krause elaborates:

[E]ducation is one such resource. . . . Because education develops the ability to gather and interpret information and to solve problems on many levels, it increases control over events and outcomes in life. . . . In contrast to those with a good education, older people with less schooling are likely to lack the skills needed to grapple with and resolve doubt. . . . [R]epeated episodes of unsuccessful encounters with [doubt] are likely to spark negative emotions, such as feelings of frustration, confusion, and bewilderment. . . . This may ultimately lead some older people to feel they are unable to control core aspects of their lives. This is important because research done in secular settings has shown that diminished feelings of self-esteem and personal control are associated with greater psychological distress.

*Id.* at 97–98 (citations omitted).

<sup>139</sup> See Schwadel, *supra* note 6, at 179 ("[H]ighly educated Americans often disassociate from organized religion and instead rely on alternative meaning systems provided by

## VI. PROTECTING THE VULNERABLE: RELIGION AS PALLIATIVE

The thesis of this analysis—that epistemological certainty underpins the religion-happiness connection—is subject to the caveat that such certainty must buoy and uplift the individual. An unwavering conviction that God takes painful vengeance on the wayward tends not to confer happiness, however convinced one might be of its rectitude. Belief in a vindictive or capricious God correlates with depression, anxiety, guilt, and negative affect.<sup>140</sup> Such an effect is far closer to Freud's bleak conception of religion than to the contemporary view of religion as salutary. It is not enough that one believe resolutely—one must believe correctly.<sup>141</sup>

This poses a particularly formidable challenge for the poor and uneducated, whose surrounding environments plunge their epistemologies into disarray.<sup>142</sup> Their conditions bring an onslaught of uncomfortable stimuli and contradictions—why such poverty and squalor when some live in abundance? Why does misfortune befall the worthy and unworthy alike? How can God abide such a state of affairs?<sup>143</sup>

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science.”); see also Diener et al., *supra* note 29, at 1278 (“[P]eople in the wealthiest nations tend to be leaving organized religion or have no specific religious affiliation. This exiting from organized religion is most pronounced in Northern Europe and in many other highly economically developed nations.” (citation omitted)).

<sup>140</sup> See Weber et al., *supra* note 34, at 73 (“Negative religious coping (i.e., a punishing God, demonic reprisals) is associated with lower quality of life and increased depression” (citations omitted)).

<sup>141</sup> See Gawronski, *supra* note 108, at 659 (examining the effect on well-being of consistency in one's convictions). Gawronski argues that:

[C]onsistency is not a motivational force in itself, but the accidental outcome of epistemic processes that aim at validating propositions that are desired and invalidating propositions that are undesired . . . . Specifically, consistency should elicit positive feelings when it validates a desired belief, . . . negative feelings when it invalidates a desired belief, but positive feelings when it invalidates an undesired belief. . . . [An] illustrative example is the tendency to justify the current social order even if the status quo goes against one's personal interests. A common finding in the literature on system justification is that the members of disadvantaged groups often adopt a negative stereotypical view of their in-group, thereby protecting their beliefs about the fairness of the current social structure.

*Id.* at 659, 661 (citations omitted).

<sup>142</sup> See Diener et al., *supra* note 29, at 1279 (“[W]hen people face problems that push them to their limits . . . religion offers a number of aids: spiritual support, ultimate explanation, a sense of larger, benevolent, forces at work in the universe, and a purpose in life that holds sacred significance.” (citations omitted)).

<sup>143</sup> See Krause et al., *Aging*, *supra* note 87, at 526 (“[I]t may be difficult for a person to believe in a loving and protecting God while at the same time recognizing that there is a

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To quiet these nagging questions, the poor and uneducated turn disproportionately to religion.<sup>144</sup> Though here a note is in order on the complex relationship between strength of conviction and external cues to doubt, a subject addressed earlier.<sup>145</sup> If external cues to doubt undermine epistemological certainty, we would expect the disquieting contradictions that confront the poor to dampen faith. Instead, the poor's travails engender a more steadfast religiosity.<sup>146</sup> Here, it is worth reviving the subject of cognitive dissonance.<sup>147</sup> Such dissonance can enervate systems of meaning and belief, casting them into a perpetual limbo between faith and doubt. But it might also force a retrenchment, as the believer cleaves ever more tightly to her beleaguered faith.<sup>148</sup>

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great deal of suffering, pain, and injustice in the world."). "[T]he presence of pain, evil, and suffering in the world serves to tax the faith of some individuals significantly." *Id.* at 525 (citation omitted).

<sup>144</sup> See Diener et al., *supra* note 29, at 1278 ("[D]eclines in religiosity are associated with economic growth."). Some scholars maintain that:

When people are frequently faced with hunger, illness, crime, and poor education—all of which are relatively more uncontrollable and more prevalent in poor societies—religion can perhaps make a greater contribution to well-being. . . . [T]he correlations between difficult circumstances and religiosity are associated at the individual level [] and country level [], suggesting that difficult circumstances lead to greater religiosity. This trend was consistent with that found in the U.S. data and reveals the strong tendency for nations with worse living circumstances to be more religious and for nations with relatively better conditions to be less religious.

*Id.* at 1278, 1284. Hayward and Elliott elaborate:

[T]here is evidence that religious factors tend to have the biggest positive impact on well-being within otherwise disadvantaged demographic groups. Krause (1998) found that religiosity was associated with reduced mortality only for older adults with low levels of education. Banthia, Moskowitz, and Folkman (2007) found the same effect for low education in the relationship between frequency of prayer and self-reported health. This effect may indicate that religion buffers negative effects suffered disproportionately by individuals with lower socio-economic status. Or it may be linked with the notion of 'intellectual religion' that highly educated people tend to be less likely to derive a sense of existential certainty from their religious beliefs.

Hayward & Elliott, *supra* note 32, at 593 (citation omitted). "[R]eligiousness is often inversely related to education level and income (because the poor, lacking other resources to fall back on, often turn to religion)." KOENIG ET AL., *supra* note 57, at 226.

<sup>145</sup> See *supra* Part IV (contending that the religion-happiness nexus can be traced both to the effect of epistemological certainty and of conformity with social norms).

<sup>146</sup> See KOENIG ET AL., *supra* note 57, at 226 (examining the relationship between religion and socio-economic status).

<sup>147</sup> See *supra* Part II.C (connecting epistemological doubt with cognitive dissonance).

<sup>148</sup> See Burns, *supra* note 12, at 4 ("In some instances, [] cognitive dissonance can actually intensify original attitudes." (citation omitted)); Burris et al., *supra* note 46, at 19 ("Based on

Where the stakes are high enough—as they are for the poor and uneducated, whose epistemological order is most in jeopardy—the will to believe can overpower dissonant cues.<sup>149</sup> The believer might fortify her epistemological armor to compensate for cracks. In this same vein, the chronically infirm tend to seek refuge in religion.<sup>150</sup> A vivisection of one's epistemology in such circumstances—the kind that Tillich and his ilk envision—risks grave consequences for the psychological well-being of the most vulnerable among us.

To ask the poor and uneducated to dissect their epistemologies is to ask too much at best and to imperil a critical palliative at worst.<sup>151</sup> Thus, the comfortable and well-educated are more adept at marrying faith and

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Festinger, Riecken, and Schachter's field observations of increased religious fervor among members of an apocalyptic religious group following a predicted cataclysm that failed to transpire, this paradigm assumes that cognitive dissonance can occur when a cherished belief is disconfirmed, leading to the use of dissonance-reducing strategies such as belief intensification." (citations omitted)).

<sup>149</sup> See Burns, *supra* note 12, at 3 ("[T]he more important the concepts challenged the greater the dissonance; the greater the dissonance, the more intense will be the need to reduce it.").

<sup>150</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 98 ("[A]n important function of religion is to allay these concerns by assuring the presence of God during this difficult time and reinforcing belief in continued existence after death. But elders struggling with religious doubt are less likely to avail themselves of . . . an important way of coping with anxiety about death.").

<sup>151</sup> See *id.* at 105–06 (stating that data consistently suggest that "older people with more education are less likely to suffer from the deleterious effects of doubt than older adults with fewer years of schooling"). Krause further states:

The data consistently provide support for this view across three different indicators of psychological well-being: life satisfaction, self-esteem, and optimism. . . . [C]ompared to older people with high education, older adults with less education are more likely to feel that having doubts about religion is wrong; they are more likely to try to deny or repress doubts when they arise; and they are less likely to forgive themselves when they encounter doubts about their faith.

*Id.* at 106. Other scholars have stated:

[A]lthough individuals living in nations with highly difficult circumstances generally have lower [subjective well-being], religious individuals had higher positive affect and lower negative affect compared with nonreligious individuals. In good circumstances, nonreligious individuals, compared with religious individuals, had slightly higher life evaluations, slightly lower positive affect, and lower negative affect. In such circumstances, nonreligious individuals generally had equal or better [subjective well-being] compared with religious individuals.

Diener et al., *supra* note 29, at 1284. "Individuals who experience difficulties in embracing religious doctrines or worldviews may be deprived of a key source of coherence and meaning in their lives. This loss of a religious 'plausibility structure,' or orienting framework . . . could generate or amplify existential uncertainty." Ellison et al., *Religious Doubts*, *supra* note 31, at 131 (citation omitted).

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doubt than are the straitened and uneducated.<sup>152</sup> The latter also endure a more painful struggle when dissonance manages to penetrate their epistemological defenses.<sup>153</sup> This is an intuitive finding, for stability in circumstances buffers against instability in the mind. One more easily endures psychic tumult if one knows that at least the comforts of life are certain to be at hand.<sup>154</sup>

But the stakes of epistemological certainty are only part of the equation here. Tillich's mature faith, the sort that successfully assimilates doubt, demands sophisticated cognitive machinery. In F. Scott Fitzgerald's memorable articulation, "[t]he test of a first rate intelligence is the ability to hold two ideas in the mind at the same time, and still retain the ability to function."<sup>155</sup> This machinery is not universal, nor does it spring full-fledged from the untrained mind. The

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<sup>152</sup> See Schwadel, *supra* note 6, at 164–66 (considering the impact of social status). Schwadel explains that:

The traditional conception of the relationship between social status and religion suggests that increases in education lead Americans to compartmentalize religion to weekend service attendance. Historically, this effect of education was tied to social status differences among religious denominations, with the middle and upper classes affiliating with denominations that are unlikely to stress the role of religion in daily life or the practice of devotional activities. . . . [E]ducation should be positively related to switching to mainline Protestant denominations, which commonly promote beliefs that are in accord with scientific knowledge and worldviews, diverse social networks, a pluralist perspective, and other attributes associated with increased education.

*Id.* at 164–66 (citation omitted).

<sup>153</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 97. The author states:

Given the lifelong influence of schooling and occupational experiences, people with higher levels of educational attainment are more likely to apply their skills in wrestling with, and resolving, religious doubt. In the process, each episode of confronting and resolving doubt may build upon itself, promoting greater self-confidence in dealing with doubt, thereby removing its sting.

*Id.*

<sup>154</sup> Diener et al., *supra* note 29, at 1289. The authors elaborate:

In societies where circumstances are more benign, the non-religious have superior life satisfaction, as well as less negative affect. They also have greater social support and feelings of being respected. . . . The nonreligious in poor societies are at the biggest disadvantage, with noticeably lower positive feelings and higher negative feelings, as well as substantial deficits in social support and respect.

*Id.*; Christopher G. Ellison et al., *Religious Involvement, Stress, and Mental Health: Findings from the 1995 Detroit Area Study*, 80 SOC. FORCES 215, 230–34 (2001) (providing data on the effects of social and psychological resources on health).

<sup>155</sup> F. Scott Fitzgerald, *The Crack-Up*, ESQUIRE MAG. 41 (Feb. 1936).

capacity to forge a coherent epistemology from disparate parts requires a subtle, capacious mind, the kind that tends not to flourish in poverty and distress.<sup>156</sup> Where sophisticated minds may weld faith and doubt into a comfortable, harmonious epistemology, cognitive dissonance may drive less expansive minds to despair. This insight has prompted some observers to argue that religion is a compensatory mechanism for the cognitively underdeveloped—a ready-made, comprehensive epistemology, with no assembly or reflection required.<sup>157</sup>

Cognitive dissonance tends particularly to discomfit the young, whose minds and epistemologies undergo a dizzying maturation process.<sup>158</sup> Like the poorly educated, the young lack the cognitive equipment necessary to assimilate doubt into their epistemologies, and the relative instability of their lives—a steady barrage of constitutional, intellectual, and circumstantial changes—compounds their inner struggle.<sup>159</sup> The old and seasoned, by contrast, have the cognitive wherewithal to cope with epistemological struggle.<sup>160</sup>

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<sup>156</sup> See Puffer, *supra* note 134, at 236 (“Social skills such as being forceful, self-assured, socially poised, confident, and verbally adept appear to be necessary ‘gear’ for people who seek to expand their religious knowledge base.” (citation omitted)); see also Krause et al., *Aging*, *supra* note 87, at 526 (“[C]ollege students who had religious doubt were better able to differentiate among alternative dimensions to problems and were more adept at integrating alternative points of view.”).

<sup>157</sup> See Christopher G. Ellison & Jeffrey S. Levin, *The Religion-Health Connection: Evidence, Theory, and Future Directions*, 25 HEALTH ED. & BEHAV. 700, 714–15 (1998). The authors quote Pollner:

As Pollner points out, “[r]eligious symbols and beliefs offer only one of many types of tools for constructing a sense of meaning and coherence.” For individuals with comparatively “restricted symbolic codes,” however, strong “religious faith may offer an especially compelling framework for interpreting daily experiences and major life events alike.” In effect, then, personal religious faith and/or practice may compensate for the lack of more sophisticated cognitive resources. This possibility suggests that the effects of divine relations and existential certainty on well-being may be strongest among persons with lower levels of formal education . . . Moreover, there is evidence that religious interpretations of life experiences may help to compensate for the dearth of more sophisticated cognitive skills among individuals with lower levels of formal education.

*Id.* (citations omitted).

<sup>158</sup> See Krause, *Religious Doubt and Psychological Well-Being*, *supra* note 52, at 95 (“[Y]ounger people are more likely than older people to experience distress when religious doubts arise.”).

<sup>159</sup> See Dein, *supra* note 56, at 212 (“As people grow older, religious doubts continue to be associated with psychopathology, but the magnitude of this association becomes weaker across age categories; the impact of doubt on mental distress declines as one ages.”).

<sup>160</sup> See Krause et al., *Aging*, *supra* note 87, at 527, 531–32 (offering supporting data). Scholars have stated:



VII. THE U.S. SUPREME COURT'S FREE EXERCISE JURISPRUDENCE

Thus far, this Article has outlined the psychological and sociological literature on the religion-happiness phenomenon and attempted to extract overarching insights from an occasionally desultory field of inquiry. It will move now to a cursory overview of the implications of these insights for the U.S. Supreme Court's free exercise jurisprudence. By no means do I intend an exhaustive commentary on the ramifications of this burgeoning area of study. I seek only to provoke some preliminary reflection on those ramifications.

Should courts and legislatures define free exercise rights expansively so as to afford the faithful a shield against epistemological doubt? This Article has attempted to show that dissonant cues—whether behavior incongruous with convictions, exposure to prevalent unbelief or religious diversity, or the prodding of an educator to embrace self-scrutiny—undercut epistemological certainty, enervating and even reversing the religion-happiness connection.<sup>161</sup> To what extent should we permit religious individuals and communities to wield the law as a cudgel against such cues?<sup>162</sup>

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[T]he maturity and more extensive experience of those who are older afford a greater ability to handle doubt. In fact, assets that accrue over the years may even make it possible to turn doubt into a growth experience . . . The data reveal that younger people may have more problems handling religious doubt than older individuals. In particular, the noxious effects of doubt on well-being do not decline substantially until about age [sixty] . . . The notion that older people are more adept at dealing with doubt and uncertainty is consistent with research on the emergence of wisdom in later life. . . . [A]lthough doubt is associated with poorer mental health outcomes, our data suggest that older adults are able to use resources that mitigate the effects of doubt on depressive symptoms. Perhaps repeated experience in grappling with doubt . . . inoculates elderly people from its noxious effects.

*Id.* (citation omitted).

<sup>161</sup> See *supra* Part IV (explaining how conformity with social norms reinforces epistemological certainty). Scholars have explained this theory as follows:

[W]hen controlling for other variables, faculty support for spiritual/religious engagement is linked to increased religious skepticism. . . . This may lead to doubts about religious truth being reflected through increased religious skepticism during college, an environment that may expose young adults to religious perspectives that they did not encounter in their home communities.

Small & Bowman, *supra* note 86, at 166–68.

<sup>162</sup> See Harmer-Dionne, *supra* note 48, at 1300, 1312 (analyzing religious exemptions). One scholar contends that:

The state should allow religious exemptions not only because freedom to practice one's religion is a fundamental right, but also because a

The Supreme Court most famously and directly confronted this question in *Wisconsin v. Yoder*, holding that the Free Exercise Clause of the U.S. Constitution entitled the Amish to an exemption from compulsory schooling laws.<sup>163</sup> The Court recognized the right of the Amish to cultivate their own, distinctive institutions, to rear their young apart from the modalities of the modern world.<sup>164</sup> *Yoder* continued a line of precedent that began nine years earlier with *Sherbert v. Verner*.<sup>165</sup> In *Sherbert*, the Court held that South Carolina's denial of unemployment benefits to a Seventh-day Adventist who refused to work on Saturday violated the Free Exercise Clause.<sup>166</sup> The *Sherbert-Yoder* approach imposed on the government the onerous burden of satisfying strict scrutiny—that is, of showing that the contested measure advanced a compelling governmental interest by narrowly tailored means—in Free Exercise Clause cases.<sup>167</sup>

Although the Court did not explicitly frame its rulings as such, applying strict scrutiny to Free Exercise challenges signaled a victory for epistemological certainty. In effect, the Court shielded the religious objectors in these cases from cognitive dissonance, arising either from a

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refusal to do so has detrimental effects on belief—belief being the one religious freedom the Supreme Court has consistently regarded as sacrosanct. In *Reynolds* and other religion cases, federal courts have reiterated their commitment to freedom of belief. If restrictions on religious practice actually change religious beliefs, then the Supreme Court must consider, more seriously than it recently has, the protection accorded those practices. . . . Roger Finke and Laurence Iannaccone argue that religious developments mirror the changes in incentives and opportunities facing the producers of religion. They chart how legal restrictions have ended various religious movements, such as the First Great Awakening in the eighteenth century, and how easing legal restrictions has correspondingly allowed various religious movements to flourish. . . . They posit that, in the post-*Smith* era, the government may pass “any number of ‘formally neutral’ and ‘generally applicable’ regulations that seriously constrain the activities of specific religions” without regard to their detrimental effects on some religions.

*Id.* (footnotes omitted).

<sup>163</sup> *Wisconsin v. Yoder*, 406 U.S. 205, 234 (1972).

<sup>164</sup> *Id.* at 222–24 (“Whatever their idiosyncrasies as seen by the majority, this record strongly shows that the Amish community has been a highly successful social unit within our society, even if apart from the conventional ‘mainstream.’ . . . There can be no assumption that today’s majority is ‘right’ and the Amish and others like them are ‘wrong.’”).

<sup>165</sup> See generally *Sherbert v. Verner*, 374 U.S. 398, 410 (1963) (examining broadly the Court’s decision). For further discussion of *Sherbert*, see Gary C. Furst, *Will the Religious Freedom Restoration Act Be Strike Three Against Preemptory Challenges?*, 30 VAL. U. L. REV. 701, 734–35 (1996).

<sup>166</sup> *Sherbert*, 374 U.S. at 400–02.

<sup>167</sup> *Id.* at 403.

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disjunction between belief and behavior (*Sherbert*) or from exposure to divergent worldviews (*Yoder*).<sup>168</sup> *Yoder* represented a particularly stark clash between sheltered epistemological certainty and the prevailing ideals of modernity as embodied in the public educational system.<sup>169</sup> The former prevailed, as the Court upheld the right of religious minorities to stand resolutely apart from mainstream society.<sup>170</sup>

But what the Court giveth, the Court taketh away.<sup>171</sup> In *Employment Division v. Smith*, the Court abandoned the *Sherbert-Yoder* strict scrutiny analysis and held that neutral laws of general applicability do not violate the Free Exercise Clause.<sup>172</sup> In so doing, it threw free exercise rights to the vicissitudes of the political process and stripped the faithful of the right, ratified in *Yoder*, to wall themselves off from mainstream society.<sup>173</sup> The Court's decision sat uneasily with Congress, which attempted to revive the *Sherbert-Yoder* precedent with the Religious Freedom Restoration Act ("RFRA").<sup>174</sup> But the Court substantially diluted RFRA's impact when it invalidated its application to the states in *City of Boerne v.*

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<sup>168</sup> *Id.* at 404. According to Festinger:

Dissonance almost always exists after an attempt has been made, by offering rewards or threatening punishment, to elicit overt behavior that is at variance with private opinion. If the overt behavior is successfully elicited, the person's private opinion is dissonant with his knowledge concerning his behavior. . . . " [I]f forced compliance has caused dissonance, one may reduce the dissonance by changing her private opinion to accord with her overt behavior.

Harmer-Dionne, *supra* note 48, at 1317 (footnotes omitted). See generally *Wisconsin v. Yoder*, 406 U.S. 205, 222-24 (1972) (discussing the effects of exposure to divergent worldviews).

<sup>169</sup> *Yoder*, 406 U.S. at 222-24; Harmer-Dionne, *supra* note 48, at 1304 (discussing *Wisconsin v. Yoder*). Harmer-Dionne explains:

Justice Berger further suggested that forced action (and perhaps forced inaction) can affect religious belief. He wrote that to apply compulsory education laws to the Amish would seriously endanger their religious beliefs by exposing their children to antithetical values. This would unjustly interfere with the religious development of the children and their integration into the Amish community.

*Id.* (footnotes omitted).

<sup>170</sup> *Yoder*, 406 U.S. at 222-24.

<sup>171</sup> See Harmer-Dionne, *supra* note 48, at 1299 ("Since 1972, the Supreme Court has rejected all claims for free exercise exemptions outside the context of unemployment benefits as addressed in *Sherbert*." (footnote omitted)).

<sup>172</sup> *Emp't Div., Dep't of Human Res. of Or. v. Smith*, 494 U.S. 872, 878-79 (1990).

<sup>173</sup> See *id.* at 879, 890 ("It may fairly be said that leaving accommodation to the political process will place at a relative disadvantage those religious practices that are not widely engaged in; but that [is an] unavoidable consequence of democratic government . . .").

<sup>174</sup> See generally Religious Freedom Restoration Act of 1993 (RFRA), Pub. L. No. 103141, 107 Stat. 1488 (providing the federal law aimed at preventing exemptions from federal laws that substantially burden the free exercise of religion).

*Flores*.<sup>175</sup> To be sure, some states have enacted RFRA analogues, and religious objectors can rely on state constitutional provisions to vindicate their free exercise rights.<sup>176</sup> But *Smith* effectively removed the most formidable weapon in their arsenal—the U.S. Constitution.

Would a return to *Sherbert-Yoder* help the faithful keep cognitive dissonance at bay and thereby redound to optimum happiness? This is a thorny question that poses at least two major complications. I have already addressed the first—that the happiness of the believer is but one consideration in a broader happiness equation.<sup>177</sup> Accommodating religious objectors may entail substantial costs for society—or even, as we have seen, for the objector herself if the conduct for which she seeks an exemption buttresses a belief in a malevolent God.<sup>178</sup> But the costs and benefits of epistemological certainty for society at large are beyond the objective of this analysis, which is to persuade the reader that the prevailing taste for self-scrutiny and internal struggle in matters religious may be misguided inasmuch as it detracts from *individual* happiness. Thus, I will bracket this potential objection. I hasten to add, however, that the happiness of the believer is hardly nugatory. To the contrary, it is a meaningful part of the larger happiness calculus.

The second complication is subtler—might expanded free exercise rights promote religious diversity and thus add to the dissonant cues that weaken or reverse the religion-happiness nexus?<sup>179</sup> Might a religious monolith, a single Truth that swallows all competing truths, redound to maximal happiness? The government could promote such a hegemon one of two ways. First, it could directly support the one Truth and muscle out its competitors. There is some empirical evidence that such a posture promotes happiness. Indeed, government support of religion correlates positively with intrinsic religiosity—for just as we would expect dissonant cues to dampen genuine belief, so too would we expect reinforcing cues to magnify it.<sup>180</sup> In the United States, however,

<sup>175</sup> *City of Boerne v. Flores*, 521 U.S. 507, 507–09 (1997).

<sup>176</sup> See Sara Lunsford Kohen, *Religious Freedom in Private Lawsuits: Untangling When RFRA Applies to Suits Involving Only Private Parties*, 10 CARDOZO PUB. L. POL'Y & ETHICS J. 43, 80 n.262 (2011) (“Fourteen states have [adopted] state RFRAs, which are similar to the federal RFRA, but apply to state law [analogues].”).

<sup>177</sup> See *supra* Part V (explaining that individual happiness is only one variable in the larger happiness calculus).

<sup>178</sup> See *supra* Part VI (discussing how religion serves as a palliative for the poor and uneducated).

<sup>179</sup> See *supra* Part IV (explaining how dissonant cues in the external world undermine religion’s salutary effect on happiness).

<sup>180</sup> See Elliott & Hayward, *supra* note 82, at 302 (“[T]he association between personal religious identity and psychological well-being increases as restrictions on overall freedom increase.”).

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the Establishment Clause prevents such an embrace of religion.<sup>181</sup> Alternatively, the government could simply withdraw and permit majoritarian rule to operate unchecked, empowering religious majorities to cement their dominance through the political process. Put differently, it could do precisely what the Supreme Court did in *Smith*.<sup>182</sup> If *Smith* facilitates the emergence of a religious monolith, might we not applaud it?<sup>183</sup>

My only response to this concededly compelling objection is that a faith comprised solely of those values and principles that command a consensus would be substantially neutered. It would in all likelihood devolve into the sort of extrinsic religiosity that we have seen correlates inversely with happiness.<sup>184</sup> Like the elastic faith of mainstream denominations, it would be a constellation of more or less universal values, a worldview with too many lacunas to provide the comfort and stability of epistemological certainty.<sup>185</sup> Again, a universalist faith does not necessarily entail epistemological doubt—though the data tend to support the natural supposition that the two coincide.<sup>186</sup> It is sufficient to reiterate that mainline Protestants and Catholics—whose values would assumedly prevail in a hegemonic arrangement—appear to be less happy than believers on the margins of the religious landscape.<sup>187</sup> Optimal happiness may demand insulating those marginal groups from dissonant cues rather than converting them into discontented Presbyterians.<sup>188</sup>

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<sup>181</sup> U.S. CONST. amend. I.

<sup>182</sup> See *Emp't Div., Dep't of Human Res. of Or. v. Smith*, 494 U.S. 872, 878 (1990) (holding that generally applicable, neutral laws do not violate the Free Exercise Clause).

<sup>183</sup> See Small & Bowman, *supra* note 86, at 168 ("Members of religious minority groups often experience the privileging of Christianity and therefore may perceive a contradiction inherent within the existence of multiple religious ideologies (minimally, their own and that of Christians)." (citation omitted)).

<sup>184</sup> See *supra* Part III.A (explaining the distinction between intrinsic and extrinsic religiosity and their different effects on happiness).

<sup>185</sup> See *supra* Part III.B (explaining the capacity of religious certainty to confer a feeling of safety and security).

<sup>186</sup> See generally PEW FORUM ON RELIGION & PUBLIC LIFE, *supra* note 86 (detailing statistics on religion in America and exploring the shifts taking place in the American religious landscape).

<sup>187</sup> See *supra* Part III.B (noting that adherents of marginal faiths tend to be happier than those of mainstream faiths).

<sup>188</sup> See Harmer-Dionne, *supra* note 48, at 1310 (examining the response of the mainstream to marginal religious movements). According to Harmer-Dionne:

A marginal religious movement ('MRM') is one which challenges the social and theological norms of the dominant culture to such a degree that the dominant culture feels compelled to marginalize and sanction it, often with startling severity. In the face of mainstream opposition, MRMs tend to follow one of two paths. On the first path, they may

VIII. CONCLUSION

The unexamined life is not worth living. So goes the venerable Socratic maxim, endorsed with gusto by enlightened, inquiring minds. Should we embrace doubt and eschew the comforts of certainty—of an orderly and stable moral, intellectual, and spiritual universe? Are we better off in the shelter of dogmatism than in the crucible of doubt? Should courts and legislatures cordon off a space within which the faithful may shield themselves from cognitive dissonance? The religion-happiness literature illuminates these vital questions and suggests that even skepticism itself ought not to escape the searching gaze of inquiring minds.

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continue to defy the dominant culture, in which case they remain in small enclaves and face continued persecution, often leading to obliteration. If MRMs follow the second path, they eventually capitulate to mainstream pressure and incorporate dominant norms to a sufficient degree to survive as viable entities.

*Id.*

